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# Final Supplemental Environmental Impact Statement

## Eldorado National Forest Travel Management

Eldorado National Forest  
El Dorado, Placer, Amador and Alpine Counties, California

### Volume 1



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# **Eldorado National Forest Travel Management**

## **Final Supplemental Environmental Impact Statement**

El Dorado, Placer, Amador and Alpine Counties

**Lead Agency:** USDA Forest Service

**Responsible Official:** Kathryn D. Hardy  
Forest Supervisor  
100 Forni Road  
Placerville, CA 95667

**For Information Contact:** Diana Erickson  
100 Forni Road  
Placerville, CA 95667  
(530) 621-5214

**Abstract:** This Final Supplemental Environmental Impact Statement documents the analysis of five alternatives for designation of portions of 42 specific existing roads and trails for public motor vehicle use on the Eldorado National Forest. Alternative 1 would designate 42 routes for public motor vehicle use and it includes amending the Eldorado National Forest Land and Resource Management Plan (LRMP), Standard and Guideline (S&G) 100, to allow for public motor vehicle use on 18 routes affecting hydrologic connectivity of meadows. Alternative 2 would take no action, and the portions of the 42 routes currently closed would remain closed to public motor vehicle use. Alternative 3 is the same as Alternative 1 except it does not include a LRMP amendment and requires implementation of mitigation measures prior to public motor vehicle use of 18 routes. Alternative 4 would designate all or portions of 21 routes and requires mitigation measures prior to public use of 15 of those routes. Alternative 5 is similar to Alternative 3 except that the 18 routes would be available for public motorized use before the corrective actions are implemented, however if corrective actions are not implemented on one of the 18 routes within five years, the route would then be closed until the corrective actions have been implemented to bring it into compliance with S&G 100.



## Summary

### Proposed Action

The Eldorado National Forest (ENF) proposes the following designations for the portions of the 42 routes that were closed by Court Order:

1. Designate for public motor vehicle use 13 routes that field surveys conducted in 2011 and 2012 determined did not cross meadows, as defined in the 1989 Eldorado National Forest Land and Resource Management Plan (LRMP). Route 09N54, a secondary access road to Leoni Meadows, would be designated up to the intersection with Route 09N60.
2. Designate for public motor vehicle use 11 routes where field surveys determined the meadow crossings meet LRMP as amended by Sierra Nevada Forest Plan Amendment (SNFPA) S&G 100 (S&G 100).
3. Amend the LRMP to allow continued public motor vehicle use on 18 routes that field surveys determined do not currently meet S&G 100, and are needed to meet other purposes, and designate those routes for public motor vehicle use.

The area affected by the proposal includes 42 routes on the Eldorado National Forest in California that were proposed for designation for public motor vehicle use in the Eldorado National Forest Public Wheeled Motorized Travel Management Environmental Impact Statement (TMFEIS) and Record of Decision (ROD), March 2008.

The purpose of this Supplement to the Environmental Impact Statement (SEIS) for the TM FEIS and ROD, March 2008, is to reconsider that portion of the ROD designating 42 specific motor vehicle routes, because the Riparian Conservation Objective (“RCO”) Analysis for RCO #2 , S&G 100, was found by court order to be lacking for those routes as they related to meadows ((Case No. 2:09-CV-02523-LKK-JFM (United States District Court, Eastern District of California, filed 7/31/12)). The court order also closed portions of these 42 routes to public motor vehicle use pending a decision based on this TM SEIS.

Standard & Guideline 100 Reads:

*“Maintain and restore the hydrologic connectivity of streams, meadows, wetlands, and other special aquatic features by identifying roads and trails that intercept, divert, or disrupt natural surface and subsurface water flow paths. Implement corrective actions where necessary to restore connectivity.”*

A Notice of Intent (NOI) to prepare this TM SEIS was published in the Federal Register on October 12, 2012, with a 45 day comment period. The notice asked that comments on the proposed action be received by November 7, 2012. In addition, as part of the public involvement process, information on the proposed action was posted on the Eldorado National Forest web site and mailed to 784 groups and individuals that have voiced an interest in Travel Management on the ENF. The Forest Service held three public open house sessions, one in Markleeville on October 22, 2012; one in Placerville on October 25, 2012, and one in Jackson on October 29, 2012, to share information about the proposal and listen to issues and concerns brought up by the public. Approximately 247 letters, emails and comment forms were received.

The following significant Issues were raised by the public during the scoping period:

**1. Road 14N39 Richardson Lake:** The original proposed action included designating only a portion of Road 14N39 up to Richardson Lake. During the Scoping period, users expressed their concern that Richardson Lake is not the main destination for motor vehicle users of route 14N39. Users enjoy a drive to the end of the road at the summit of Sourdough Hill to enjoy the views and the sunset. They requested that the entire route be designated for public motorized use.

*This issue was addressed through a modification to the Proposed Action (Alternative #1). The route is now proposed for designation all the way to the end at the top of Sourdough Hill in Alternative #1.*

**2. Land and Resource Management Plan Amendment:** Amending the Land and Resource Management Plan (LRMP) to allow continued public motor vehicle use in sensitive meadow habitats will result in unacceptable impacts to hydrology, natural vegetation and wildlife habitat.

*Alternatives #3 and #4 were developed to address this issue. Alternatives #3 and #4 would not amend the LRMP.*

**3. Corrective Actions:** The proposed action does not include corrective actions to fix the routes found inconsistent with S&G100, so impacts to meadows will continue to persist.

*Alternatives #3, #4 and #5 address this issue. While Alternatives #3, #4 and #5 do not include a description of the necessary actions required to bring each route into compliance with S&G 100, routes inconsistent with S&G 100 would not be available for public use until work has been completed to bring them into compliance.*

Five alternatives are analyzed in this SEIS:

### **Alternative 1**

Described above as the Proposed Action.

### **Alternative 2: No Action**

The same portions of the 42 routes that were closed under the court order would remain closed to public motor vehicle use. There would be no amendments to the LRMP.

### **Alternative 3: The Preferred Alternative**

Alternative 3 was developed in response to public comments received during the scoping period for this SEIS. There would not be any amendments to the LRMP under this alternative.

Alternative 3 is similar to Alternative 1 with the following exceptions:

The LRMP would not be amended for the routes as proposed in Alternative 1: 09N01, 09N08, 16E26 (09N82) 19E01 (09N83), 09N95, 0.5 miles of 10N13 (Schneider Camp Road), 17E73 (6.8 miles of 10N13, Strawberry Cr. 4WD trail), 10N14, 16E27 (10N21; Long Canyon 4WD trail), 10N98, 16E33 (11N23F), 16E21 (11N26F (; Barrett 4WD trail), 11NY32, 14N39, 17E16, 17E19, and 17E28. Instead, these routes would continue to be part of the NFTS but would remain closed to public motor vehicle use until the routes are in compliance with S&G 100 as it pertains to meadows. This alternative identifies these routes for future corrective actions, but does not analyze the actions necessary to bring meadow crossings into compliance with S&G 100. Corrective actions would be proposed and analyzed as part of future National Environmental Policy Act (NEPA) analyses, as funding to implement corrective actions becomes available. After corrective actions have been analyzed and implemented, the route would appear as a designated public motor vehicle road or trail on the next revision of the Motor Vehicle Use Map (MVUM).

The LRMP would also not be amended for routes 17E24 and 10N01B (10N01). The portion of 17E24, Carson Emigrant Trail, from the new Mud Lake Trailhead south to the intersection with 17E28 would be designated for public motor vehicle use. The remaining portions of 17E24 would continue to be part of the National Forest Transportation System (NFTS) but would remain closed to public motor vehicle use until the routes are in compliance with S&G 100 as it pertains to meadows. The eastern portion of 10N01B (10N01), Spur off Woods Lake Road, up to a point just east of meadow 10N01-1 would

be designated for public motor vehicle use. The west portion of 10N01B (10N01) would continue to be part of the NFTS but would remain closed to public motor vehicle use until the routes are in compliance with S&G 100 as it pertains to meadows. After corrective actions have been analyzed and implemented on the remaining portions of 17E24 and 10N01B (10N01), the routes would appear as designated public motor vehicle roads or trails on the next revision of the MVUM.

Physical closure will occur for routes that will not be repaired for some time or analysis of corrective actions determines that repair is not practical in order to meet S&G #100.

#### **Alternative 4**

Alternative 4 was developed in response to public comments received during the scoping period for this SEIS. There would not be any amendments to the LRMP under this alternative.

Alternative 4 is similar to Alternative 1 except for the following:

The following routes or portions of routes would be designated for public motor vehicle use: 09N54 (open up to intersection with 09N60, closed to public motor vehicle use past that point), 10N06, 10N26, 11N09A, 11N22, 11N70, 13N24, 09N15, 10NY05 (open from 10NY04 to a point just before drainage near 16E27, and closed beyond that point) and 14N05 (open up to McKinstry Trailhead, closed to public motorized use beyond the trailhead), and 14N27.

The following routes or portions of routes that are currently closed by court order would continue to be a part of the NFTS but would remain closed to public motor vehicle use until the routes are brought into compliance with S&G 100 as it pertains to meadows: 09N01, 09N08, 10N13 (open to a spot suitable for camping just north of Schneider Camp meadow, closed to public motor vehicle use beyond that point), 10N14, 10N21 (16E27) (open except for the section between 10NY04E and the section currently open on the west end), 11N26F (16E21), 11NY32. This alternative identifies these routes for future corrective actions, but does not analyze the actions necessary to bring each route into compliance with S&G 100. Corrective actions would be proposed and analyzed as part of future NEPA analyses, as funding to implement corrective actions becomes available. After corrective actions have been analyzed and implemented, the route would appear as a designated public motor vehicle road or trail on the next revision of the MVUM.

The following routes or portions of routes that are currently closed by court order would continue to be a part of the NFTS but would remain closed to public motor vehicle use until mitigation for resource concerns not directly related to S&G 100 and meadows is implemented: 08N23B, 12NY15, 08N35, 10N32, and 10NY06. Reasons for mitigation of

these routes are documented in the project record, but the mitigation is not analyzed in this document. Mitigation would be proposed and analyzed as part of future NEPA analyses, as funding to implement corrective actions becomes available. After the mitigation has been analyzed and implemented, routes would appear as designated public motor vehicle roads or trails on the next revision of the MVUM. Portions of these routes that are currently open under the court order would remain open for public motor vehicle use.

The following portions of routes that are not currently closed by court order would continue to be a part of the NFTS but would be closed to public motor vehicle use and until mitigation for resource concerns not directly related to S&G 100 and meadows is implemented: western 2.26 miles of 09N04 (17E79), and 10N03. Reasons for mitigation of these routes are documented in the project record, but the mitigation is not analyzed in this document. Mitigation would be proposed and analyzed as part of future NEPA analyses, as funding to implement corrective actions becomes available. After the mitigation has been analyzed and implemented, routes would appear as designated public motor vehicle roads or trails on the next revision of the MVUM.

The portions of the following routes that are currently closed to public motor vehicle use under court order would continue to be a part of the NFTS but would remain closed to public motor vehicle use: 09N54 past intersection with 09N60, 10NY04, 17E12, 14N58, 17E17, 17E21, the southern portion of 16E26 (09N82)), 19E01 (09N83) (09N95, 10N01B (10N01), 17E73 (10N13 closed beyond Schneider Camp), 10N21 (portion between 10NY04E and the section currently open on the west end), 10N98, 16E33 (11N23F), a portion of 12NY06, 14N05 past McKinstry Trailhead, 14N39, 17E16, 17E19, 17E24 (west and east portions), and 17E28. In addition, in a change from the draft TM SEIS, corrective actions to bring each route into compliance with S&G 100 would still be proposed and analyzed as part of future NEPA analyses, as funding to implement corrective actions becomes available. These routes would remain available for administrative use, emergency access, and non-motorized recreation, but would not be designated for public motor vehicle use. A portion of 12NY06 that is not currently closed to public motor vehicle use by court order would be closed in this alternative. In addition, based on public comment, a provision is added to Alternative 4 that physical closure will be considered for routes that will not be repaired for some time or analysis of corrective actions determines that repair is not practical.

## Alternative 5

Alternative 5 was developed in response to public comments received during the scoping period for this SEIS.

Alternative 5 is similar to Alternative 1 with the following exceptions:

The 18 routes requiring corrective actions to be in compliance with S&G 100 would remain open to public motor vehicle use until the corrective actions were analyzed and implemented to bring them into compliance with S&G 100, however if the corrective actions are not implemented on a specific route within five years, that route would then be closed to public motor vehicle use until the corrective actions have been implemented to bring it into compliance with S&G 100.

Physical closure will occur for routes that will not be repaired for some time or analysis of corrective actions determines that repair is not practical in order to meet S&G 100.

## Summary of Effects to Hydrology

There are 24 routes where there is no difference between the alternatives with regard to S&G 100. This is because 14 routes do not cross or border meadows and 10 routes cross or border meadows that meet S&G 100.

There are 18 routes – the routes that have caused at least one meadow to not meet S&G 100 - where there are differences between the alternatives with regard to S&G 100. Alternative 1 (Proposed Action) would create a *Forest Plan Amendment* that would exempt those 18 routes from S&G 100. Alternative 2 (no action) would result in zero of those 18 routes meeting S&G 100. Alternatives 3 and 4 would result in 18 of those routes meeting S&G 100. Under Alternative 5, the number of routes that meet S&G 100 after five years could range between zero and 18. The results with regard to S&G 100 are summarized in Table 3.8 and Figure 3.9. In addition, adverse impacts to 38 meadows (from the 18 routes) would be less from Alternatives 3, 4, and 5 than Alternatives 1 and 2.

Alternatives 1 and 2 would not meet the criteria of 36 CFR § 212.55 subpart b with respect to minimizing damage to meadows from trails. Alternatives 3, 4, and 5 would meet 36 CFR § 212.55 subpart b with respect to minimizing damage to meadows from trails. Alternatives 3 and 4 would meet 36 CFR § 212.55 subpart b to a greater degree than Alternative 5 with respect to minimizing damage to meadows from trails.

## **Summary of Effects to Public Motor Vehicle Use**

The analysis of Public Motor Vehicle Use shows that the alternatives differ substantially as to effects to recreation users. Alternatives 1 and 5 result in the highest number of miles of roads and trails rated high in recreation value open to public motorized use initially (95.8 miles). Alternative 3 results in the same number of miles of high value recreation routes designated for public motorized use, however only 55.2 of those miles would be open initially, with an additional 40.6 miles continuing to be part of the NFTS but not designated for public motorized use and identified on a MVUM until corrective actions are analyzed and implemented. Alternative 4 would result in 3.7 miles of high recreation value routes open to public motorized use, with an additional 13.4 miles continuing to be part of the NFTS but not designated for public motorized use and identified on a MVUM until corrective actions or mitigation are analyzed and implemented, and 46.7 miles of high value recreation routes closed to public motor vehicle use. In Alternative 2, No Action, only the 30 miles of high value recreation routes that were not closed by court order would remain open, with 65.9 miles of high value recreation routes closed to public motorized use.

## **Summary of Effects to Newly Proposed Threatened and Endangered Species**

In Alternative 1, Sierra Nevada yellow-legged frogs could be directly and indirectly affected by motor vehicle use on routes 17E24 (east) and 17E28, where they are known to occur. Ten routes would be designated open for public motor vehicle use which could affect proposed critical habitat for the Sierra Nevada yellow-legged frog; 10N01B, 10N13, 16E21, 16E26, 16E27, 17E19, 17E24, 17E28, 17E73, and 19E01. Yosemite toads occur in habitat crossed by routes 09N01 and 19E01, both of which would be designated open for public motor vehicle use. These routes traverse habitat where there is potential for direct impacts to Yosemite toads and for routes to increase sediment delivery or impact meadow hydrology in occupied habitats that have also been recently proposed as critical habitat for the Yosemite toad.

In Alternative 2, under the no action alternative, no direct or indirect effects to Sierra Nevada yellow-legged frogs or Yosemite toads or their proposed critical habitat would result, although the presence of some roads or trails, even without public motor vehicle use on these routes, may continue to impact their habitat until corrective actions are implemented.

In Alternative 3, known occurrences of Sierra Nevada yellow-legged frogs and Yosemite toads would not be directly or indirectly affected by routes that would be immediately opened for public motor vehicle use. Six routes have the potential to influence streams or water bodies that may provide habitat for the Sierra Nevada yellow-legged frog and two

routes have the potential to influence habitat for the Yosemite toad, but surveys indicated these species were absent at these sites. Routes that would be opened for public motor vehicle use in Alternative 3 meet Standard and Guideline 100 and would not affect the quality of SNYLF habitat within areas proposed as critical habitat. None of the routes that would be immediately opened in Alternative 3 are within areas proposed as critical habitat for Yosemite toad. Additional routes (or portions of routes) that occur within Sierra Nevada yellow-legged frog or Yosemite toad habitat would remain closed for public motor vehicle use until after corrective actions have been implemented. Biological assessment and conferencing or consultation with the U.S. Fish and Wildlife Service would occur during future analysis if it is determined that corrective actions or public motor vehicle use on these routes may affect the Sierra Nevada yellow legged frog or the Yosemite toad or their critical habitats.

In Alternative 4, known occurrences of Sierra Nevada yellow-legged frogs and Yosemite toads would not be directly or indirectly affected by routes that would be immediately opened for public motor vehicle use. Two routes have the potential to influence streams or water bodies that may provide habitat for the Sierra Nevada yellow-legged frog but surveys indicated the species was absent at these sites. 14N05 is the only route occurring in SNYLF critical habitat, and field review determined this route would not affect habitat elements. None of the routes occur with the range of the Yosemite toad or its critical habitat. As described for Alternative 3, biological assessment and conferencing or consultation with the U.S. Fish and Wildlife Service would occur during future analysis of additional routes, if it is determined that corrective actions or public motor vehicle use on these routes may affect the Sierra Nevada yellow legged frog or the Yosemite toad or their critical habitats.

Alternative 5 would initially have the same effects upon SNYLF and Yosemite toads and their critical habitat as Alternative 1 until corrective actions are taken over a five year period.

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# Chapter 1. Purpose of and Need for Action

## Introduction

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The purpose of this supplement to the TM FEIS & ROD, March 2008, is to reconsider that portion of the ROD designating 42 specified motor vehicle routes, because the Riparian Conservation Objective ('RCO') Analysis for RCO #2, Standard and Guideline 100 (S&G100), was found by court order to be lacking for those routes as it pertains to meadows (Case No. 2:09-CV-02523-LKK-JFM (United States District Court, Eastern District of California, filed 7/31/12)). All other portions of the Forest Service's original decision, including the parts of the 42 routes that do not intersect meadows, remain in effect.

This SEIS addresses only the additional information and analysis relevant to the 42 specific routes, meadows, and S&G100 in the Eldorado National Forest. For a complete discussion of other resources and effects, including cumulative effects and monitoring requirements, the readers should review the TMFEIS & ROD, March 2008, available on the Eldorado National Forest website <http://www.fs.usda.gov/eldorado/> or by request from 100 Forni Road, Placerville, CA 95667.

## Document Structure

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The Forest Service has prepared this SEIS in compliance with the National Environmental Policy Act (NEPA) and other relevant Federal and State laws and regulations. This SEIS discloses the direct and indirect environmental impacts that would result from the proposed action and alternatives. The document is organized as follows:

- **Chapter 1. Purpose and Need for Action:** This chapter briefly describes the proposed action, the need for that action, and other purposes to be achieved by the proposal. This section also details how the Forest Service informed the public of the proposed action and how the public responded.
- **Chapter 2. Alternatives, including the Proposed Action:** This chapter provides a detailed description of the agency's proposed action as well as alternative actions that were developed in response to comments raised by the public during scoping. The end of the chapter includes a summary table comparing the proposed action and alternatives with respect to their environmental impacts.
- **Chapter 3. Affected Environment and Environmental Consequences:** This chapter describes the environmental impacts of the proposed action and alternatives on recreation and hydrology.
- **Chapter 4. Consultation and Coordination:** This chapter provides a list of preparers and agencies consulted during the development of the environmental impact statement.

- **Glossary:** This section provides definitions for terms used throughout the document.
- **Literature Cited:** This section provides details on literature referenced throughout the SEIS.
- **Appendices:** The appendices provide more detailed information to support the analyses presented in the SEIS.

## Background

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In March, 2008, the US Forest Service completed the TM FEIS & ROD. A comprehensive background Summary of Eldorado National Forest Travel Management Direction may be found on page 1-2 of that document.

Relevant Information from the TMFEIS includes the following:

- The 2008 TMFEIS and ROD designated roads and trails to be open for public motor vehicle use and to prohibit cross country travel. The decision designated the class of vehicle allowed and season of use for each route.
- Each of the action alternatives except Alternative E included non-significant Forest Plan amendments for various combinations of routes crossing meadows – they are listed in Chapter 2 of the TMFEIS in the description of each alternative.
- The selected alternative, Alternative Modified B, included a non-significant LRMP amendment that addressed 20 routes through meadows. Only 19 of those routes were designated for public wheeled motorized travel under the Travel Management Decision. An additional 23 routes with segments less than .05 miles through any meadows were designated for motor vehicle use without a Forest Plan amendment. There were numerous other routes that bordered or crossed meadows that were not designated for public motor vehicle use.
- The January, 2004 SNFPA amended the LRMP, established Riparian Conservation Objectives (RCOs), standards and guidelines (particularly S&G 100), and direction to complete a RCO Analysis for all new activities that might affect Riparian Conservation Areas (RCAs). In compliance with the ROD for the SNFPA, the Forest completed the “Reconciliation: Sierra Nevada Forest Plan Amendment 2004 ROD & Eldorado Forest Plan” to clearly state that the Standards and Guidelines for Management Area 28 (Meadows) from the 1989 LRMP were replaced by the SNFPA meadow allocation and Standards and Guidelines. The RCO Analysis for the TMFEIS included the criterion that routes that bisect or go through meadows have the potential of not meeting RCO #2. The identification of individual routes was completed using the Forest’s Geographic Information System (GIS) database.
- In Table 7 of the RCO analysis (a part of the project record for the EIS), there is a listing of 42 routes through meadows, which includes the 19 routes designated in Modified Alternative B, plus another 23.

- The TMFEIS included a monitoring strategy for meadows: “Within two years of implementation, commence field monitoring of meadows greater than one acre in size that have a road or trail within the meadow or that bisects the meadow. Public wheeled motor vehicle use through meadows can impair hydrologic function. If adverse impacts to hydrologic function are detected, appropriate measures (including closure) will be employed to restore proper functioning condition.”

Following the TMFEIS:

- The Eldorado National Forest issued a Motor Vehicle Use Map in April, 2009, showing the designated routes as established through the TMFEIS ROD. The map was updated in 2010 and again in 2012. The 2012 MVUM included the changes in routes as identified in the 7/31/12 decision of the Eastern District Federal Court, Judge Karlton.
- In keeping with the final decision in the TMFEIS ROD, a number of routes or portions of routes that were previously classified as National Forest System roads but will be managed as trails were changed on the Forest Transportation System to 4WD Trails. These routes received a new trail number. The routes are tracked in this Final SEIS by the new trail number (contains an E in the number) followed by the previous road number (contains an N in the number) in parenthesis. On the GIS map set accompanying this document, the routes are also labeled with the new trail number, followed by the associated old road number in parentheses.
- Following the signing of the TMFEIS ROD there were 26 administrative appeals. These appeals were resolved and the decision upheld by the Regional Forester.
- In 2009 a complaint was filed with the Eastern District Federal Court alleging a number of deficiencies in the EIS.
- In 2010, the Eldorado National Forest contracted some monitoring for meadows associated with designated routes. The results of the monitoring indicated that some meadows mapped in GIS were not actually meadows. It also indicated that some meadows were in poor condition, although it did not specifically conclude that designated routes were the cause of the meadows being in poor condition.
- On May 26, 2011, Judge Karlton issued an opinion (Court Case No. 2:09-CV-02523-LKK-JFM) that raised an issue as to whether the Forest Service had adequately explained why ephemeral streams could not function as suitable, non-breeding California red-legged frog habitat. On September 1, 2011, the Forest Service received US Fish and Wildlife Service concurrence that the Forest Service’s designation of routes in Alternative Modified B in the Travel Management Decision was not likely to adversely affect the California red-legged frog. Accordingly, the Forest Service prepared a new Biological Assessment and plaintiffs agreed the issue has been resolved. Therefore the issue will not be addressed in this SEIS.

- In its opinion dated May 26, 2011, the Court also found the Forest Service failed to comply with the National Forest Management Act (“NFMA”) in connection with its analysis and designation of routes encountering meadows. Specifically, the court found that the Forest Service had designated 42 routes through meadows which were inconsistent with certain standards and guidelines in both the Forest’s 1989 Land and Resource Management Plan (LRMP) and standards and guidelines within the 2004 Sierra Nevada Forest Plan Amendment (SNFPA), which amended the ENF LRMP. The Court pointed out that the error in the agency’s Travel Management Decision was limited to 42 routes designated for public wheeled motor vehicle travel that have some segment(s) that go through meadows.
- As planned in the TMFEIS Monitoring Strategy, field surveys were conducted in 2011 and 2012 at the 95 meadows crossed or bordered by the 42 routes in order to determine compliance with S&G 100 of the 2004 SNFPA ROD as it pertains to meadows. S&G100 states: “Maintain and restore the hydrologic connectivity of streams, meadows, wetlands, and other special aquatic features by identifying roads and trails that intercept, divert, or disrupt natural surface and subsurface water flow paths. Implement corrective actions where necessary to restore connectivity.” The field surveys were completed by a Hydrologist and a Hydrologic Technician. The results of the surveys are summarized in the Hydrology section in Chapter 3 of this SEIS.
- On February 14, 2012, the Eastern District Court judge remanded the portion of the decision that designated 42 roads through meadows for motor vehicle traffic for reconsideration. The Forest Service was directed to submit a proposed order within 30 days that sets aside that portion of its decision that designated the 42 roads to the degree they go through meadows, and not affecting the sections of those same roads that do not go through meadows, unless they cannot otherwise be reached. Seasonal closures currently in place were to be extended until further order of the court.
- A final order on Case No. 2:09-CV-02523-LKK-JFM was issued by the Eastern District Court judge on July 31, 2012. That order “sets aside and remands for reconsideration in light of the applicable law that portion of the Forest Service’s Final Environmental Impact Statement relating to the Riparian Conservation Objective (RCO) Analysis for RCO #2 S&G 100 pertaining to the meadows on the 42 routes... Until such time as the Forest Service completes supplemental environmental analysis pursuant to the National Environmental Policy Act (NEPA) as provided above, public wheeled motorized vehicle use of a route listed ... that intersects a meadow shall be prohibited or limited ... All other portions of the Forest Service’s decision, including the parts of the 42 routes that do not intersect meadows, remain in effect.” The order also directed the Forest Service to revise the MVUM to incorporate changes called for in the order. The revised MVUM was prepared and made available to the public in September, 2012. The Forest is continuing to manage the designated route system at the present time under the 2012 MVUM.

## Purpose and Need for Action

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The underlying needs for this proposal include:

1. There is a need to comply with the United States District Court for the Eastern District of California Case No. 2:09-CV-02523-LKK-JFM, Court Order filed 07/31/12 in which the Court “set aside and remanded for reconsideration in light of the applicable law that portion of the Forest Service’s Final Environmental Impact Statement relating to the RCO Analysis for RCO #2 S&G 100 pertaining to the meadows on the 42 routes.”
2. There is a need to determine whether public wheeled motor vehicle use will be allowed on the 42 specific routes, or some portion of these routes, designated for such use in the 2008 TM FEIS ROD that were found by the court to be inconsistent with the LRMP Standards and Guidelines, as amended by SNFPA.

The action must also achieve the following purposes from the National Travel Management Rule of 2005:

- Providing wheeled motor vehicle access to existing developed and dispersed recreation opportunities on the Forest,
- Providing a diversity of wheeled motor vehicle recreation opportunities, and
- Protecting natural resources

As outlined in the TMEIS, Purpose and Need for Action, page 1-5 through 1-6.

## Proposed Action

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The Proposed Action is similar to the proposed action that was circulated for public scoping with a few minor corrections and a change in the proposal for route 14N39, Richardson Lake. The proposed action circulated in October 2012 proposed this route for designation for public motor vehicle use up to Richardson Lake, with the portion from Richardson Lake to the top of Sourdough Hill closed to public motor vehicle use. Comments were received during the scoping period that stated the main destination of that route was not Richardson Lake but the view from the top of Sourdough Hill. The proposed action was modified to include designation of the segment of road 14N39 from Richardson Lake to the summit of Sourdough Hill.

The Forest Service conducted field surveys of the 42 routes in 2011 and 2012 to determine compliance with S&G 100 of the Sierra Nevada Forest Plan Amendment Record of Decision (SNFPA ROD 2004) as it pertains to meadows.

The field surveys found that 14 of the routes do not cross or border meadows: For these routes the Forest proposes to:

1. Designate 08N23B, 08N35, 10N06, 10N26, 10N32, 10NY04, 11N09A, 11N22, 11N70, 12NY15, and 13N24 as “NFTS Road: Open to All Highway and Non-Highway Legal Vehicles.” Designate the western 2.2 miles of 09N04 (17E79) as “NFTS 4WD Trail: Open to High Clearance Vehicles.” Designate Road 09N54 (a secondary access road to Leoni Meadows) up to its intersection with 09N60 as “NFTS Road: Open to All Highway and Non-Highway Legal Vehicles.” Designate 17E12 as “NFTS Trail: Open to Motorcycles only.”

Field surveys revealed that the following 10 routes cross or border meadows, but crossings meet S&G 100: For these routes the Forest proposes to:

2. Designate 09N15, 10NY05, 10NY06, 12NY06, 14N05, 14N27 and 14N58 as “NFTS Road: Open to All Highway and Non-Highway Legal Vehicles.” Designate 10N03 as “NFTS Road: Open to Highway Legal Vehicles only.” Designate 17E17 and 17E21 as “NFTS Trail: Open to Motorcycles only.”

For the remaining 18 routes (10N13 is described in two segments), field surveys determined they do not currently meet S&G 100. The proposed action would designate them by amending the Eldorado National Forest Plan to exclude those routes from the SNFPA S&G No. 100 requirement.

3. SNFPA S&G No. 100 would not apply to meadows crossed by the following routes. Roads 09N01, 09N08, 09N95, 10N01 (B), 0.5 miles of 10N13, 10N14, 10N98, and 14N39 would be designated as “NFTS Road: Open to All Highway and Non-Highway Legal Vehicles.” Road 11NY32 would be designated as as “NFTS Road: Open to Highway Legal Vehicles only.” Routes 09N82 (16E26), 09N83 (19E01), 6.8 miles of 10N13 (17E73), 10N21 (16E27), 11N23F (16E33), 11N26F (16E21), and 17E24 would be designated as as “NFTS 4WD Trail: Open to High Clearance Vehicles.” Routes 17E16, 17E19 and 17E28 would be designated as as “NFTS Trail: Open to Motorcycles only.”

The proposed action is described in more detail in Chapter 2 under Alternative 1.

## Decision Framework

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Given the purpose and need, the Forest Supervisor will need to determine whether public wheeled motor vehicle use will be allowed on any or all of the 42 routes found by the court to be inconsistent with the Eldorado National Forest Land and Resource Management Plan, 1989 (LRMP) Standards and Guidelines, as amended by SNFPA, and whether or not to amend the Eldorado National Forest Plan in conjunction with any such route designations.

## Forest Plan Direction

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The proposed action and alternatives are guided by the Eldorado National Forest Land and Resource Management Plan (LRMP), as amended by the Sierra Nevada Forest Plan Amendment Final Supplemental Environmental Impact Statement Record of Decision, January, 2004 (SNFPA). The Forest is subdivided into land allocations (Management Areas) with established desired conditions and associated management direction (standards and guidelines). The land allocation that applies to this proposal is Management Area 28 – Meadow Management (LRMP, pp. 4-277 through 4-282). The definition of a meadow from the 1989 Land Resource Management Plan (page 4-90) was used: “A meadow is defined as a grassy opening, 0.1 acres or larger, dominated by perennial sedges, rushes, and grasses (wet meadow) or perennial grasses and forbs (dry meadow).” The Standards and Guidelines that apply to management of meadows were amended by the SNFPA. The SNFPA provided new standards and guidelines that replaced the standards and guidelines of the original 1989 LRMP for meadows.

S&G 100 on page 63 of the 2004 SNFPA ROD applies directly to the purpose and need of this SEIS. S&G 100 states: “Maintain and restore the hydrologic connectivity of

streams, meadows, wetlands, and other special aquatic features by identifying roads and trails that intercept, divert, or disrupt natural surface and subsurface water flow paths. Implement corrective actions where necessary to restore connectivity.”

## Public Involvement

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A Notice of Intent (NOI) to prepare the Eldorado National Forest Travel Management Supplemental Environmental Impact Statement (SEIS) was published in the Federal Register on October 12, 2012. The notice asked that comments on the proposed action be received by November 7, 2012. In addition, as part of the public involvement process, information on the proposed action was posted on the Eldorado National Forest web site and emailed to 784 groups and individuals that have voiced an interest in travel management on the Eldorado National Forest. The Forest Service held three public Open House sessions, one in Markleeville on October 22, 2012; one in Placerville on October 25, 2012, and one in Jackson on October 29, 2012, to share information about the proposal and listen to issues and concerns brought up by the public. Approximately 247 letters, emails and comment forms from the public scoping and public Open House sessions were received providing public comments on the proposed action.

The Draft Travel Management Supplemental Impact Statement was released February 20, 2013. The draft SEIS, consisting of two volumes, was posted on the Eldorado National Forest web site, with notification mailed and emailed to groups and individuals that have voiced an interest in reviewing it. Three public Open House sessions were held, one on February 26, 2013 in Placerville, one on March 5, 2013 in Markleeville, and one on March 6, 2013 in Jackson, to share information about the draft SEIS and the Forest Service preferred alternative. Approximately 232 letters, emails and comment forms were received during the 45 day comment period on the draft SEIS. A summary of those submitting comments is included in Appendix C of this FSEIS, and a document containing Forest Service response to comments on the draft SEIS is included in Appendix D of this FSEIS.

## Issues

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Comments from the public, other agencies, and tribes were used to formulate issues concerning the proposed action. The Forest Service separated the issues into two groups: significant and non-significant. Significant issues were defined as those directly or indirectly caused by implementing the proposed action. Non-significant issues were identified as those: 1) outside the scope of the proposed action; 2) already decided by law, regulation, Forest Plan, or other higher level decision; 3) irrelevant to the decision to be made; or 4) conjectural and not supported by scientific or factual evidence. The

Council on Environmental Quality (CEQ) NEPA regulations explain this delineation in Sec. 1501.7, "...identify and eliminate from detailed study the issues which are not significant or which have been covered by prior environmental review (Sec. 1506.3)...". A Summary of Public Comments received during the scoping period and the issues that were identified may be found in the DSEIS and in the project record located at the Eldorado National Forest Supervisor's Office, Placerville, California.

Comments were received during scoping questioning the field methodology used to determine effects to meadows:

- 1. Field Survey Methodology:** In particular, they indicated they felt the methodology for assessing compliance with S&G 100 was not adequate for that purpose and did not follow General Technical Report WO-86a.

*This issue was determined to be conjectural and, therefore not carried forward in this SEIS. The methodology in General Technical Report WO-86a, which provides a detailed characterization of groundwater dependent features, does not specifically evaluate compliance with S&G 100. As a result, a methodology was developed for this purpose as described in Table 3.6 of this SEIS. In addition, General Technical Report WO-86a is only intended for a few types of features that are supported by groundwater (springs, peatlands, and other wetlands) and not intended for meadows and wetlands that are not supported by groundwater (i.e. supported by surface runoff and precipitation). The methodology developed for evaluating compliance with S&G 100 does apply to meadows and wetlands that are not supported by groundwater, and these types of features were within the scope of features that might be encountered during the field surveys*

The Forest Service identified the following significant issues from the public comments during scoping:

- 1. Route 14N39 - Richardson Lake:** Richardson Lake is not the main destination for route 14N39. Users enjoy a drive to the summit of Sourdough Hill to enjoy the views and the sunset. The entire route should be designated for public motor vehicle use.

*This issue was addressed through a modification to the Proposed Action (Alternative #1). The route is now proposed for designation all the way to the top of Sourdough Hill in Alternative #1.*

- 2. Land and Resource Management Plan Amendment:** Amending the Land and Resource Management Plan (LRMP) to allow continued public motor vehicle use in sensitive meadow habitats will result in unacceptable impacts to hydrology, natural vegetation and wildlife habitat.

*Alternatives #3 and #4 were developed to address this issue. Alternatives #3 and #4 would not amend the LRMP.*

**3. Corrective Actions:** The proposed action does not include corrective actions to fix the routes found inconsistent with S&G 100 so impacts to meadows will continue to persist.

*Alternatives #3 and #4 both address this issue. While Alternatives #3 and #4 do not include a description of the necessary actions required to bring each route into compliance with S&G 100 as it pertains to meadows, routes inconsistent with S&G 100 would not be available for public use until work has been completed to bring them into compliance.*

## Chapter 2. Alternatives, Including the Proposed Action

### Introduction

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This chapter describes and compares the alternatives considered for the Eldorado National Forest Travel Management Supplemental Environmental Impact Statement. It describes both alternatives considered in detail and those eliminated from detailed study. The end of this chapter presents the alternatives in tabular format so that the alternatives can be readily compared. One of the alternatives, Alternative 1, includes an amendment to the Eldorado National Forest Land and Resource Management Plan (LRMP).

### Changes between DSEIS and FSEIS

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On April 25, 2013 the U.S. Fish and Wildlife Service issued a proposed rule to list the Sierra Nevada yellow-legged frog as an endangered species and the Yosemite toad as a threatened species, and issued a proposed rule to designate critical habitat for each species under the Endangered Species Act (ESA). Final rules will be issued approximately a year from the date of the proposed rules, and changes may occur to the proposed critical habitat boundaries or other elements of the rules. A number of the routes being evaluated in this FSEIS occur within the range of these species and within areas proposed as critical habitat. Therefore information about the presence of Sierra Nevada yellow-legged frogs, Yosemite toads, or their proposed critical habitat has been added to this FSEIS.

Alternative 3 has been modified slightly from the Draft TM SEIS based on public comments received on the Draft SEIS requesting a review of 10N01 and other routes to see if there were some portions of the routes that could be reopened that were not affecting meadows. Forest staff reviewed all of the routes affecting meadows and recommended that a portion of 17E24 and a portion of 10N01B (10N01) could be opened for public motor vehicle use without affecting the meadows.

A provision is added to Alternative 3 that physical closure will occur for routes that will not be repaired for some time or analysis of corrective actions determines that repair is not practical in order to meet S&G 100.

Alternative 4 has also been modified based on public comment. In the modified version in this FSEIS, routes that are closed to public motor vehicle use will also receive corrective actions where needed to bring the routes into compliance with S&G 100.

A new Alternative was also developed in response to public comment received on the Draft TM SEIS. A complete description may be found under Alternative 5 in this chapter.

## Development of the Proposed Action

In order to address the purpose and need, the 42 routes were surveyed in 2011 and 2012 in order to: 1.) reassess the location of the meadows on National Forest land that border or cross the 42 routes, and 2.) determine whether those routes were in compliance with S&G 100 of the LRMP as amended by the Sierra Nevada Forest Plan Amendment Record of Decision (SNFPAROD 2004) as it pertains to meadows. S&G 100 states: *“Maintain and restore the hydrologic connectivity of streams, meadows, wetlands, and other special aquatic features by identifying roads and trails that intercept, divert, or disrupt natural surface and subsurface water flow paths. Implement corrective actions where necessary to restore connectivity.”*

The following table summarizes the field surveys of the 42 routes in 2011 and 2012.<sup>1,2</sup>

	List of routes <sup>2</sup>	Number of routes
<b>Routes that do <u>not</u> cross or border meadows on National Forest land.</b>	08N23B, 08N35, 09N54, 17E79 (09N04), 10N06, 10N26, 10N32, 10NY04, 11N09A, 11N22, 11N70, 12NY15, 13N24, 17E12 (Lovers Leap Trail).	14
<b>Routes that only cross or border meadows that meet Standard &amp; Guideline 100.</b>	09N15, 10N03, 10NY05, 10NY06, 12NY06, 14N05, 14N27, 14N58, 17E17, 17E21.	10
<b>Routes that cross or border at least one meadow that does <u>not</u> meet Standard &amp; Guideline 100.</b>	09N01, 09N08, 16E26 (09N82, 19E01 (09N83), 09N95, 10N01, 17E73 (10N13 Strawberry 4WD trail), 10N14, 16E27 ( 10N21 Long Canyon 4WD trail), 10N98, 16E33 (11N23F), 16E21 (11N26F , Barrett 4WD trail), 11NY32, 14N39, 17E16, 17E19, 17E24, 17E28.	18

<sup>1</sup> The field surveys do not include meadows on private land.

<sup>2</sup> Alternate route numbers and names are shown in parenthesis.

The Proposed Action was developed based on the information summarized in the previous table. Analysis supporting the determination as to whether routes meet S&G 100 is provided in Chapter 3 under Hydrology.

## Alternatives Considered in Detail

Based on the issues identified through public comment on the proposed action, the Forest Service developed three alternative proposals that achieve the purpose and need specified in the July 31, 2012 Court Order, including the Proposed Action. In addition, the Forest

Service is required to analyze a No Action alternative. The alternatives are described in detail below.

### **Alternative 1 - Proposed Action**

Minor changes have been made to Alternative 1 since the circulation of the Proposed Action during scoping in October, 2012. Route 09N54, a secondary access road to Leoni Meadows, was moved to the category of “No Meadows on National Forest Land” since the meadow is located on private property. Routes 14N05 and 14N58 were moved into the category of Meadows meeting S&G 100, and routes 08N35, 09N04 (17E79), 10N32 and 11N09A were moved to the category of “No Meadows on National Forest Land” based on review of information collected and additional field surveys.

In response to public scoping, there was also a change in the proposal for route 14N39, Richardson Lake. The proposed action circulated in October 2012 proposed this route for designation for public motor vehicle use up to Richardson Lake, with the portion from Richardson Lake to the top of Sourdough Hill closed to public motor vehicle use. Comments were received during the scoping period that stated the main destination of that route was not Richardson Lake but the view from the top of Sourdough Hill, requesting designation of the entire route. In the proposed action carried forward into this SEIS, the entire route would be designated for public motor vehicle use.

A Forest Plan Amendment is included in Alternative 1, the Proposed Action, to provide an exception to S&G100 of the LRMP Sierra Nevada Forest Plan Amendment (SNFPA) to allow for public motorized use on sections affecting the hydrologic connectivity of meadows until corrective actions are analyzed and implemented at some time in the future.

The Eldorado National Forest proposes to designate the following routes for public motor vehicle use:

**Table 2.1 Route Designations under Alternative 1 – Proposed Action**

<b>Designate for public motor vehicle use (Route found to not cross or border a meadow)</b>			
<b><i>Route Number</i></b>	<b><i>Route Name</i></b>	<b><i>Designation</i></b>	<b><i>LRMP Amendment</i></b>
08N23B	Prothro Headwater	NFTS Road: Open to All Highway and Non-Highway Legal Vehicles.	A LRMP Amendment is not required for these routes
08N35	Upper West Panther	NFTS Road: Open to All Highway and Non-Highway Legal Vehicles.	
17E79 * (9N04 - western portion()) *	Pardoe 4WD	NFTS 4WD Trail: Open to High Clearance Vehicles.	
09N54	Leoni	Designate only the portion up to intersection with 09N60 as NFTS Road: Open to All Highway and Non-Highway Legal Vehicles	
10N06	Pebble Ridge	NFTS Road: Open to All Highway and Non-Highway Legal Vehicles.	
10N26	Sciots Creek	NFTS Road: Open to All Highway and Non-Highway Legal Vehicles.	
10N32	South Beanville Creek	NFTS Road: Open to All Highway and Non-Highway Legal Vehicles.	
10NY04	Middle Long Canyon	NFTS Road: Open to All Highway and Non-Highway Legal Vehicles.	
11N09A	Bryan Creek	NFTS Road: Open to All Highway and Non-Highway Legal Vehicles.	
11N22	Strawberry Creek	NFTS Road: Open to All Highway and Non-Highway Legal Vehicles.	
11N70	McManus	NFTS Road: Open to All Highway and Non-Highway Legal Vehicles.	

12NY15	West Robbs Peak	NFTS Road: Open to All Highway and Non-Highway Legal Vehicles.	
13N24	Dry Lakes	NFTS Road: Open to All Highway and Non-Highway Legal Vehicles.	
17E12	Lovers Leap Motorcycle Trail	NFTS Trail: Open to Motorcycles only.	
<b>Designate for public motor vehicle use (Meadow/s meeting S&amp;G 100)</b>			
09N15	Leek Springs Valley	NFTS Road: Open to All Highway and Non-Highway Legal Vehicles.	A LRMP Amendment is not required for these routes
10N03	Devil’s Gate Summer Home	NFTS Road: Open to All Highway Legal Vehicles.	
10NY05	Rocky Road	NFTS Road: Open to All Highway and Non-Highway Legal Vehicles.	
10NY06	Upper Long Canyon	NFTS Road: Open to All Highway and Non-Highway Legal Vehicles.	
12NY06	Crystal Shortcut	NFTS Road: Open to All Highway and Non-Highway Legal Vehicles.	
14N05	McKinstry Lake	NFTS Road: Open to All Highway and Non-Highway Legal Vehicles	
14N27	Bunker Meadow	NFTS Road: Open to All Highway and Non-Highway Legal Vehicles.	
14N58	Jerrett	NFTS Road: Open to All Highway and Non-Highway Legal Vehicles.	
17E17	Bucks Pasture Motorcycle Trail	NFTS Trail: Open to Motorcycles only.	
17E21	Horse Canyon Trail	NFTS Trail: Open to Motorcycles only.	

Designate for public motor vehicle use with LRMP Amendment			
09N01	Blue Lakes	NFTS Road: Open to All Highway and Non-Highway Legal Vehicles	In Alternative 1, these routes would be designated for public motor vehicle use with an exception to S&G 100 of the LRMP to allow for public motor vehicle use on sections affecting the hydrologic connectivity of meadows until corrective actions are analyzed and implemented.
09N08	Stockton Camp	NFTS Road: Open to All Highway and Non-Highway Legal Vehicles	
16E26* 09N82 – southern portion)	Squaw Ridge 4WD Trail	NFTS 4WD Trail: Open to High Clearance Vehicles	
09N83 (19E01)*	Clover Valley/Deer Valley Trail	NFTS 4WD Trail: Open to High Clearance Vehicles	
09N95	Cosumnes Head	NFTS Road: Open to All Highway and Non-Highway Legal Vehicles	
10N01B* (10N01)	Spur off Woods Lake	NFTS Road: Open to All Highway and Non-Highway Legal Vehicles	
10N13 – 1.1 miles	Schneider Camp Road	NFTS Road: Open to All Highway and Non-Highway Legal Vehicles	
17E73* (10N13 – 6.8 miles)	Strawberry 4WD Trail	NFTS 4WD Trail: Open to High Clearance Vehicles	
10N14	Mule Canyon	NFTS Road: Open to All Highway and Non-Highway Legal Vehicles	
16E27* (10N21)	Long Canyon 4WD Trail	NFTS 4WD Trail: Open to High Clearance Vehicles	
10N98	Jim Quinn Spur	NFTS Road: Open to All Highway and Non-Highway Legal Vehicles	
16E33* (11N23F)	North Shanty Spur	NFTS 4WD Trail: Open to High Clearance Vehicles	
16E21* (11N26F)	Barrett Lake 4WD Trail	NFTS 4WD Trail: Open to High Clearance Vehicles	

11NY32	47 Milestone	NFTS Road: Open to All Highway Legal Vehicles
14N39	Richardson Lake	NFTS Road: Open to All Highway and Non-Highway Legal Vehicles
17E16	Little Round Top	NFTS Trail: Open to Motorcycles only
17E19	Allen's Camp Motorcycle Trail	NFTS Trail: Open to Motorcycles only
17E24 (west and east portions)	Carson Emigrant National Recreation Trail	NFTS 4WD Trail: Open to High Clearance Vehicles
17E28	Long Valley	NFTS Trail: Open to Motorcycles only

\* New road or trail numbers listed , followed by a road or trail number from the original TMFEIS in parenthesis for tracking purposes. A list of the road and trail numbers that have been changed since the TMFEIS is located in Appendix A.

### *Routes with Specific Forest Plan Amendments*

The following routes or route segments would require a Forest Plan amendment to be designated open for public wheeled motor vehicle use: 09N01, 09N08, 16E26 (09N82), 19E01 (09N83) 09N95, 10N01, 0.5 miles of 10N13 (Schneider Camp Road), 17E73 (6.8 miles of 10N13, Strawberry Cr. 4WD trail), 10N14, 16E27 10N21 ( Long Canyon 4WD trail), 10N98, 16E33 (11N23F) 16E21 (11N26F, Barrett 4WD trail), 11NY32, 14N39, 17E16, 17E19, 17E24, and 17E28. These routes are proposed for a Forest Plan amendment because they provide important, high-value recreation opportunities (such as high elevation motorized trail experiences, connecting routes or areas, access to areas of interest, and access for dispersed camping. They would be designated for public motor vehicle use with an exception to S&G 100 of the LRMP SNFPA to allow for public motor vehicle use on sections affecting the hydrologic connectivity of meadows until such time as corrective actions are analyzed and implemented

### **Alternative 2 – No Action**

Under the No Action alternative, current management would continue. The same portions of the 42 routes that were closed under the court order would remain closed to public motor vehicle use. No designation of route segments currently closed would be

implemented. There would be no amendments to the LRMP. There would be no requirement for corrective actions to bring routes into compliance with S&G100.

Administrative motor vehicle use would continue on routes regardless of whether they are open for public motor vehicle use.

### **Alternative 3 – Preferred Alternative**

Alternative 3 was developed in response to public comments received during the scoping period for this SEIS that were against amending the LRMP to allow continued public motor vehicle use in sensitive meadow habitats. There would not be any amendments to the LRMP under this alternative.

Alternative 3 is similar to Alternative 1 with the following exceptions:

The LRMP would not be amended for the routes as proposed in Alternative 1: 09N01, 09N08, 16E26 (09N82) 19E01 (09N83), 09N95, 0.5 miles of 10N13 (Schneider Camp Road), 17E73 (6.8 miles of 10N13, Strawberry Cr. 4WD trail), 10N14, 16E27 (10N21; Long Canyon 4WD trail), 10N98, 16E33 (11N23F), 16E21 (11N26F (; Barrett 4WD trail), 11NY32, 14N39, 17E16, 17E19, and 17E28. Instead, these routes would continue to be part of the NFTS but would remain closed to public motor vehicle use until the routes are in compliance with S&G 100 as it pertains to meadows. This alternative identifies these routes for future corrective actions, but does not analyze the actions necessary to bring each into compliance with S&G 100. Corrective actions would be proposed and analyzed as part of future NEPA analyses, as funding to implement corrective actions becomes available. After corrective actions have been analyzed and implemented, the route would appear as a designated public motor vehicle road or trail on the next revision of the MVUM.

The LRMP would also not be amended for routes 17E24 and 10N01B (10N01). The portion of 17E24, Carson Emigrant Trail, from the new Mud Lake Trailhead south to the intersection with 17E28 would be designated for public motor vehicle use. The remaining portions of 17E24 would continue to be part of the NFTS but would remain closed to public motor vehicle use until the routes are in compliance with S&G 100 as it pertains to meadows. The eastern portion of 10N01B (10N01), Spur off Woods Lake Road, up to a point just east of meadow 10N01-1 would be designated for public motor vehicle use. The west portion of 10N01B (10N01) would continue to be part of the NFTS but would remain closed to public motor vehicle use until the routes are in compliance with S&G 100 as it pertains to meadows. After corrective actions have been analyzed and implemented on the remaining portions of 17E24 and 10N01B (10N01), the routes would appear as designated public motor vehicle roads or trails on the next revision of the MVUM.

Physical closure will be considered for routes that will not be repaired for some time or analysis of corrective actions determines that repair is not practical in order to meet S&G 100.

Administrative motor vehicle use would continue on routes regardless of they are open for public motor vehicle use.

### *Routes with Specific Forest Plan Amendments*

There are no routes requiring LRMP amendments under this alternative.

### **Alternative 4**

Alternative 3 was developed in response to public comments received during the scoping period for this SEIS that were against amending the LRMP to allow continued public motor vehicle use in sensitive meadow habitats, and, in addition, requested closure for some routes and mitigation for other resource concerns. There would not be any amendments to the LRMP under this alternative.

Alternative 4 is similar to Alternative 1 except for the following:

The following routes or portions of routes would be designated for public motor vehicle use: 09N54 (open up to intersection with 09N60, closed to public motor vehicle use past that point), 10N06, 10N26, 11N09A, 11N22, 11N70, 13N24, 09N15, 10NY05 (open from 10NY04 to a point just before drainage near 16E27, and closed beyond that point) and 14N05 (open up to McKinstry Trailhead, closed to public motorized use beyond the trailhead), and 14N27.

The following routes or portions of routes that are currently closed by court order would remain closed to public motor vehicle use until the routes are brought into compliance with S&G 100 as it pertains to meadows: 09N01, 09N08, 10N13 (open to a spot suitable for camping just north of Schneider Camp meadow, closed to public motor vehicle use beyond that point), 10N14, 10N21 (16E27) (open except for the section between 10NY04E and the section currently open on the west end), 11N26F (16E21), 11NY32. This alternative identifies these routes for future corrective actions, but does not analyze the actions necessary to bring each route into compliance with S&G 100. Corrective actions would be proposed and analyzed as part of future NEPA analyses, as funding to implement corrective actions becomes available. After corrective actions have been analyzed and implemented, the route would appear as a designated public motor vehicle road or trail on the next revision of the MVUM.

The following routes or portions of routes that are currently closed by court order would remain closed to public motor vehicle use until mitigation for resource concerns not directly related to S&G 100 and meadows is implemented: 08N23B, 12NY15, 08N35,

10N32, and 10NY06. Reasons for mitigation of these routes are documented in the project record, but the mitigation is not analyzed in this document. Mitigation would be proposed and analyzed as part of future NEPA analyses, as funding to implement corrective actions becomes available. After the mitigation has been analyzed and implemented, routes would appear as designated public motor vehicle roads or trails on the next revision of the MVUM. Portions of these routes that are currently open under the court order would remain open for public motor vehicle use.

The following portions of routes that are not currently closed by court order would continue to be a part of the NFTS but would be closed to public motor vehicle use and until mitigation for resource concerns not directly related to S&G 100 and meadows is implemented: western 2.26 miles of 09N04 (17E79), and 10N03. Reasons for mitigation of these routes are documented in the project record, but the mitigation is not analyzed in this document. Mitigation would be proposed and analyzed as part of future NEPA analyses, as funding to implement corrective actions becomes available. After the mitigation has been analyzed and implemented, routes would appear as designated public motor vehicle roads or trails on the next revision of the MVUM.

The portions of the following routes that are currently closed to public motor vehicle use under court order would remain closed to public motor vehicle use: 09N54 past intersection with 09N60, 10NY04, 17E12, 14N58, 17E17, 17E21, the southern portion of 16E26 (09N82), 19E01 (09N83), 09N95, 10N01B (10N01), 17E73, 10N13 (closed beyond Schneider Camp), 10N21 (portion between 10NY04E and the section currently open on the west end), 10N98, 16E33 (11N23F), a portion of 12NY06, 14N05 past McKinstry Trailhead, 14N39, 17E16, 17E19, 17E24 (west and east portions), and 17E28. In addition, in a change from the draft TM SEIS, corrective actions to bring each route into compliance with S&G 100 would still be proposed and analyzed as part of future NEPA analyses, as funding to implement corrective actions becomes available. These routes would remain available for administrative use, emergency access, and non-motorized recreation, but would not be designated for public motor vehicle use. A portion of 12NY06 that is not currently closed to public motor vehicle use by court order would be closed in this alternative. In addition, physical closure will be considered for routes that will not be repaired for some time or analysis of corrective actions determines that repair is not practical.

Administrative motor vehicle use would continue on routes regardless of whether they are open for public motor vehicle use

### *Routes with Specific Forest Plan Amendments*

There are no routes requiring LRMP amendments under this alternative.

## Alternative 5

Alternative 5 was developed in response to public comments received during the scoping period for this SEIS.

Alternative 5 is similar to Alternative 1 with the following exceptions:

The 18 routes requiring corrective actions to be in compliance with S&G 100 would remain open to public motor vehicle use until the corrective actions were analyzed and implemented to bring them into compliance with S&G 100, however if the corrective actions are not implemented on a specific route within five years, that route would then be closed to public motor vehicle use until the corrective actions have been implemented to bring it into compliance with S&G 100.

Administrative motor vehicle use would continue on routes regardless if they are open for public motor vehicle use.

Physical closure will be considered for routes in the event that the analysis of corrective actions determines that repair is not practical in order to meet S&G 100.

### *Routes with Specific Forest Plan Amendments*

The following routes or route segments would require a Forest Plan amendment to be designated open for public wheeled motor vehicle use: 09N01, 09N08, 16E26 (09N82), 19E01 (09N83), 09N95, 10N01, 0.5 miles of 10N13 (Schneider Camp Road), 17E73 (6.8 miles of 10N13; Strawberry Cr. 4WD trail), 10N14, 16E27 10N21 ( Long Canyon 4WD trail), 10N98, 16E33 (11N23F), 16E21 (11N26F, Barrett 4WD trail), 11NY32, 14N39, 17E16, 17E19, 17E24, and 17E28. These routes are proposed for a Forest Plan amendment because they provide important, high-value recreation opportunities (such as high elevation motorized trail experiences, connecting routes or areas, access to areas of interest, and access for dispersed camping. They would be designated for public motor vehicle use with an exception to S&G 100 of the LRMP SNFPA to allow for public motor vehicle use on sections affecting the hydrologic connectivity of meadows until such time as corrective actions are analyzed and implemented.

## Alternatives Considered but Eliminated from Detailed Study \_\_\_\_

Federal agencies are required to rigorously explore and objectively evaluate all reasonable alternatives and to briefly discuss the reasons for eliminating any alternatives that were not developed in detail (40 CFR 1502.14). Public comments received in response to the Proposed Action provided suggestions for alternative methods for achieving the purpose and need. Some of these alternatives may have been outside the scope of the need for the proposal, duplicative of the alternatives considered in detail, or determined to be components that would cause unnecessary environmental harm. Therefore, three alternatives were considered, but dismissed from detailed consideration for reasons summarized below:

1. An alternative which included closure and rehabilitation of some routes was considered but not carried forward. The purpose and need of this analysis was to reconsider whether to allow public motor vehicle use on 42 specific routes. An alternative addressing closure and rehabilitation of those routes that are not designated for public motor vehicle use is beyond the scope of this analysis since a decision is not being made regarding other uses of the routes including administrative use or permitted use such as access to private property.
2. An alternative was considered that would analyze in detail the corrective actions needed for each route that did not meet S&G 100. This alternative was not carried forward because substantially more time and resources would be required to analyze in detail the appropriate corrective actions that could be taken for each route, including additional field analysis for potential reroutes and associated ground disturbance. Such corrective actions will be analyzed on a route by route basis as required by the alternative that is selected in the Record of Decision. This will allow the 24 routes that do not affect meadows to be reopened immediately.
3. An alternative similar to Alternative 5 was considered, but with one addition: a wet route closure plan would be developed and implemented for the 18 routes that do not meet S&G 100. This alternative was not analyzed in detail because a number of the most popular routes (14N39, 17E19, 17E24, 17E28, 17E73, and 16E27) would not dry out during most years and therefore would not be open to public motor vehicle use, effectively making the alternative similar to Alternative 3. This conclusion is based on the field surveys of 2011 and 2012.

## Comparison of Alternatives

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The table on the following pages provides a brief summary of mileages of route designations under each of the alternatives in comparative format.

Table 2.2 Comparison of Alternatives

Route					Alternative 1 - Proposed Action				Alternative 2 - No Action			
Number	Name	Designation	Total miles	Miles currently open for public motorized use	Additional miles designated for public motorized use	Additional miles designated for public motorized use with LRMP amendment	Additional miles suitable for public motorized use to be designated and added to MVUM after corrective actions or mitigation	Miles closed to public motorized use	Additional miles designated for public motorized use	Additional miles designated for public motorized use with LRMP amendment	Additional miles suitable for public motorized use to be designated and added to MVUM after corrective actions or mitigation	Miles closed to public motorized use
Routes found by USFS to not cross or border meadows on National Forest land												
08N23B	Prothro Headwater	NFTS Road: Open to All Highway and Non-Highway Legal Vehicles.	3.37	1.71	1.66	0	0	0	0	0	0	1.66
08N35	Upper West Panther	NFTS Road: Open to All Highway and Non-Highway Legal Vehicles.	1.76	1.65	0.11	0	0	0	0	0	0	0.11
09N54	Leoni Meadows	NFTS Road: Open to All Highway and Non-Highway Legal Vehicles	1.89	1.33	0.03	0	0	0.53	0	0	0	0.56
10N06	Pebble Ridge	NFTS Road: Open to All Highway and Non-Highway Legal Vehicles.	2.21	2.15	0.06	0	0	0	0	0	0	0.06
10N26	Sciots Creek	NFTS Road: Open to All Highway and Non-Highway Legal Vehicles.	3.08	0	3.08	0	0	0	0	0	0	3.08
10N32	South Beanville Creek	NFTS Road: Open to All Highway and Non-Highway Legal Vehicles.	5.19	5.17	0.02	0	0	0	0	0	0	0.02
10NY04	Middle Long Canyon	NFTS Road: Open to All Highway and Non-Highway Legal Vehicles.	2.66	1.35	1.31	0	0	0	0	0	0	1.31
11N09A	Bryan Creek	NFTS Road: Open to All Highway and Non-Highway Legal Vehicles.	1.95	0.91	1.04	0	0	0	0	0	0	1.04
11N22	Strawberry Creek	NFTS Road: Open to All Highway and Non-Highway Legal Vehicles.	2.02	0.98	1.04	0	0	0	0	0	0	1.04
11N70	McManus	NFTS Road: Open to All Highway and Non-Highway Legal Vehicles.	5.32	5.23	0.09	0	0	0	0	0	0	0.09
12NY15	West Robbs Peak	NFTS Road: Open to All Highway and Non-Highway Legal Vehicles.	3.78	0.87	2.91	0	0	0	0	0	0	2.91
13N24	Dry Lakes	NFTS Road: Open to All Highway and Non-Highway Legal Vehicles.	3.93	3.91	0.02	0	0	0	0	0	0	0.02
17E12	Lovers Leap Motorcycle Trail	NFTS Trail: Open to Motorcycles only.	1.55	0	1.55	0	0	0	0	0	0	1.55
17E79 (west end 09N04)	Pardoe 4WD	NFTS 4WD Trail: Open to High Clearance Vehicles.	2.26	2.26	0	0	0	0	0	0	0	0
Routes found by USFS to meet Standard & Guideline #100												
09N15	Leek Springs Valley	NFTS Road: Open to All Highway and Non-Highway Legal Vehicles.	0.2	0	0.2	0	0	0	0	0	0	0.2
10N03	Devil's Gate Summer Home	NFTS Road: Open to All Highway and Non-Highway Legal Vehicles.	0.47	0.47	0	0	0	0	0	0	0	0
10NY05	Rocky Road	NFTS Road: Open to All Highway and Non-Highway Legal Vehicles.	1.26	0	1.26	0	0	0	0	0	0	1.26
10NY06	Upper Long Canyon	NFTS Road: Open to All Highway and Non-Highway Legal Vehicles.	1.64	0	1.64	0	0	0	0	0	0	1.64
12NY06	Crystal Shortcut	NFTS Road: Open to All Highway and Non-Highway Legal Vehicles.	1.32	1.1	0.22	0	0	0	0	0	0	0.22
14N05	McKinstry Lake	NFTS Road: Open to All Highway and Non-Highway Legal Vehicles.	5.02	0.18	4.84	0	0	0	0	0	0	4.84
14N27	Bunker Meadow	NFTS Road: Open to All Highway and Non-Highway Legal Vehicles.	8.74	5.32	3.42	0	0	0	0	0	0	3.42
14N58	Jerrett	NFTS Road: Open to All Highway and Non-Highway Legal Vehicles.	1.66	0	1.66	0	0	0	0	0	0	1.66
17E17	Bucks Pasture Motorcycle Trail	NFTS Trail: Open to Motorcycles only.	3.77	0	3.77	0	0	0	0	0	0	3.77
17E21	Horse Canyon Trail	NFTS Trail: Open to Motorcycles only.	5.01	0	5.01	0	0	0	0	0	0	5.01

	Alternative 3				Alternative 4					Alternative 5			
Number	Additional miles designated for public motorized use	Additional miles designated for public motorized use with LUMP amendment	Additional miles suitable for public motorized use to be designated and added to MVUM after corrective actions or mitigation	Miles closed to public motorized use	Miles currently open that remain open under Alternative 4	Additional miles designated for public motorized use	Additional miles suitable for public motorized use to be designated and added to MVUM after corrective actions or mitigation	Additional miles designated for public motorized use to be added to MVUM after mitigation	Miles closed to public motorized use	Additional miles designated for public motorized use	Additional miles designated for public motorized use with LUMP amendment	Additional miles suitable for public motorized use to be designated and added to MVUM after corrective actions or mitigation	Miles closed to public motorized use
Routes found by USFS to not cross or border meadows on National Forest land													
08N23B	1.66	0	0	0	1.71	0	0	1.66	0	1.66	0	0	0
08N35	0.11	0	0	0	1.65	0	0	0.11	0	0.11	0	0	0
09N54	0.03	0	0	0.53	1.33	0.03	0	0	0.53	0.03	0	0	0.53
10N06	0.06	0	0	0	2.15	0.06	0	0	0	0.06	0	0	0
10N26	3.08	0	0	0	0	3.08	0	0	0	3.08	0	0	0
10N32	0.02	0	0	0	5.17	0	0	0.02	0	0.02	0	0	0
10NY04	1.31	0	0	0	1.35	0	0	0	1.31	1.31	0	0	0
11N09A	1.04	0	0	0	0.91	1.04	0	0	0	1.04	0	0	0
11N22	1.04	0	0	0	0.98	1.04	0	0	0	1.04	0	0	0
11N70	0.09	0	0	0	5.23	0.09	0	0	0	0.09	0	0	0
12NY15	2.91	0	0	0	0.87	0	0	2.91	0	2.91	0	0	0
13N24	0.02	0	0	0	3.91	0.02	0	0	0	0.02	0	0	0
17E12	1.55	0	0	0	0	0	0	0	1.55	1.55	0	0	0
17E79 (west end 09N04)	0	0	0	0	0	0	0	2.26	0	0	0	0	0
Routes found by USFS to meet Standard & Guideline #100													
09N15	0.2	0	0	0	0	0.2	0	0	0	0.2	0	0	0
10N03	0	0	0	0	0	0	0	0.47	0	0	0	0	0
10NY05	1.26	0	0	0	0	0.93	0	0	0.33	1.26	0	0	0
10NY06	1.64	0	0	0	0	0	0	1.64	0	1.64	0	0	0
12NY06	0.22	0	0	0	0.82	0	0	0	0.5	0.22	0	0	0
14N05	4.84	0	0	0	0.18	2.93	0	0	1.91	4.84	0	4.84	0
14N27	3.42	0	0	0	5.32	3.42	0	0	0	3.42	0	0	0
14N58	1.66	0	0	0	0	0	0	0	1.66	1.66	0	0	0
17E17	3.77	0	0	0	0	0	0	0	3.77	3.77	0	0	0
17E21	5.01	0	0	0	0	0	0	0	5.01	5.01	0	0	0

Table 2.2 Comparison of Alternatives (continued)

Route					Alternative 1 - Proposed Action				Alternative 2 - No Action			
Number	Name	Designation	Total miles	Miles currently open for public motorized use	Additional miles designated for public motorized use	Additional miles designated for public motorized use with LRMP amendment	Additional miles designated for public motorized use to be added to MVUM after mitigation	Miles closed to public motorized use	Additional miles designated for public motorized use	Additional miles designated for public motorized use with LRMP amendment	Additional miles designated for public motorized use to be added to MVUM after mitigation	Miles closed to public motorized use
Routes found by USFS to not meet Standard & Guideline #100												
09N01	Blue Lakes	NFTS Road: Open to All Highway and Non-Highway Legal Vehicles.	2.44	1.77	0	0.67	0	0	0	0	0	0.67
09N08	Stockton Camp	NFTS Road: Open to All Highway and Non-Highway Legal Vehicles.	0.3	0.15	0	0.15	0	0	0	0	0	0.15
09N95	Cosumnes Head (paved)	NFTS Road: Open to All Highway and Non-Highway Legal Vehicles.	0.45	0	0	0.45	0	0	0	0	0	0.45
10N01B (10N01)	Spur off Woods Lake	NFTS Road: Open to All Highway and Non-Highway Legal Vehicles.	0.83	0	0	0.83	0	0	0	0	0	0.83
10N13	Schneider Camp Road	NFTS Road: Open to All Highway and Non-Highway Legal Vehicles.	1.12	0.63	0	0.49	0	0	0	0	0	0.49
10N14	Mule Canyon	NFTS Road: Open to All Highway and Non-Highway Legal Vehicles.	2.47	0	0	2.47	0	0	0	0	0	2.47
10N98	Jim Quinn Spur	NFTS Road: Open to All Highway and Non-Highway Legal Vehicles.	1.94	0	0	1.94	0	0	0	0	0	1.94
11N32	47 Milestone	NFTS Road: Open to All Highway Legal Vehicles	0.44	0	0	0.44	0	0	0	0	0	0.44
14N39	Richardson Lake 4WD	NFTS Road: Open to All Highway and Non-Highway Legal Vehicles.	2.65	0	0	2.65	0	0	0	0	0	2.65
16E21 (11N26F)	Barrett Lake 4WD Trail	NFTS 4WD Trail: Open to High Clearance Vehicles	5.35	0	0	5.35	0	0	0	0	0	5.35
16E26 (09N82)	Squaw Ridge 4WD Trail	NFTS 4WD Trail: Open to High Clearance Vehicles	7.47	0.5	0	6.97	0	0	0	0	0	6.97
16E27 (10N21)	Long Canyon 4WD Trail	NFTS 4WD Trail: Open to High Clearance Vehicles	3.99	2.41	0	1.58	0	0	0	0	0	1.58
16E33 (11N23F)	North Shanty Spur	NFTS 4WD Trail: Open to High Clearance Vehicles	3.21	2.94	0	0.27	0	0	0	0	0	0.27
17E16	Little Round Top	NFTS Trail: Open to Motorcycles only.	2.36	0	0	2.36	0	0	0	0	0	2.36
17E19	Allens Camp Motorcycle Trail	NFTS Trail: Open to Motorcycles only.	1.97	0	0	1.97	0	0	0	0	0	1.97
17E24 (west & east ends)	Carson Emigrant National Recreation Trail	NFTS 4WD Trail: Open to High Clearance Vehicles	8.22	1.46	0	6.76	0	0	0	0	0	6.76
17E28	Long Valley	NFTS Trail: Open to Motorcycles only.	3.81	0	0	3.81	0	0	0	0	0	3.81
17E73 (10N13)	Strawberry 4WD trail	NFTS 4WD Trail: Open to High Clearance Vehicles	6.73	0	0	6.73	0	0	0	0	0	6.73
19E01 (09N83)	Clover Valley/Deer Valley Trail	NFTS 4WD Trail: Open to High Clearance Vehicles	4.83	1.65	0	3.18	0	0	0	0	0	3.18

Number	Alternative 3				Alternative 4					Alternative 5			
	Additional miles designated for public motorized use	Additional miles designated for public motorized use with LRMP amendment	Additional miles designated for public motorized use to be added to MVUM after mitigation	Miles closed to public motorized use	Miles currently open that remain open under Alternative 4	Additional miles designated for public motorized use	Additional miles designated for public motorized use with LRMP amendment	Additional miles designated for public motorized use to be added to MVUM after mitigation	Miles closed to public motorized use	Additional miles designated for public motorized use	Additional miles designated for public motorized use with LRMP amendment	Additional miles suitable for public motorized use to be designated and added to MVUM after corrective actions or mitigation	Miles closed to public motorized use
Routes found by USFS to not meet Standard & Guideline #100													
09N01	0	0	0.67	0	1.77	0	0	0.67	0	0	0.67	0	0
09N08	0	0	0.15	0	0.15	0	0	0.15	0	0	0.15	0	0
09N95	0	0	0.45	0	0	0	0	0	0.45	0	0.45	0	0
10N01B (10N01)	0.64	0	0.19	0	0	0	0	0	0.83	0	0.83	0	0
10N13	0	0	0.49	0	0.63	0	0	0.17	0.31	0	0.49	0	0
10N14	0	0	2.47	0	0	0	0	2.47	0	0	2.47	0	0
10N98	0	0	1.94	0	0	0	0	0	1.94	0	1.94	0	0
11N32	0	0	0.44	0	0	0	0	0.44	0	0	0.44	0	0
14N39	0	0	2.65	0	0	0	0	0	2.65	0	2.65	0	0
16E21 (11N26F)	0	0	5.35	0	0	0	0	5.35	0	0	5.35	0	0
16E26 (09N82)	0	0	6.97	0	0.5	0	0	0	6.97	0	6.97	0	0
16E27 (10N21)	0	0	1.58	0	2.41	0	0	0.24	1.34	0	1.58	0	0
16E33 (11N23F)	0	0	0.27	0	2.94	0	0	0	0.27	0	0.27	0	0
17E16	0	0	2.36	0	0	0	0	0	2.36	0	2.36	0	0
17E19	0	0	1.97	0	0	0	0	0	1.97	0	1.97	0	0
17E24 (west & east ends)	1.18	0	5.57	0	1.46	0	0	0	6.76	0	6.76	0	0
17E28	0	0	3.81	0	0	0	0	0	3.81	0	3.81	0	0
17E73 (10N13)	0	0	6.73	0	0	0	0	0	6.73	0	6.73	0	0
19E01 (09N83)	0	0	3.18	0	1.65	0	0	0	3.18	0	3.18	0	0

## Comparison of Alternatives: Effects by Resource Area

### *Hydrology*

The Hydrology Analysis indicates

There are 24 routes where there is no difference between the alternatives with regard to S&G 100. This is because 14 routes do not cross or border meadows and 10 routes cross or border meadows that meet S&G 100.

There are 18 routes – the routes that have caused at least one meadow to not meet S&G 100 - where there are differences between the alternatives with regard to S&G 100.

Alternative 1 would create a *Forest Plan Amendment* that would exempt those 18 routes from S&G #100. Alternative 2 would result in zero of those 18 routes meeting S&G 100. Alternatives 3 and 4 would result in 18 of those routes meeting S&G 100. Under Alternative 5, the number of routes that meet S&G 100 after five years could range between zero and 18. The results with regard to S&G 100 are summarized in Table 3.8 and Figure 3.9. In addition, adverse impacts to 38 meadows (from the 18 routes) would be less from Alternatives 3, 4, and 5 than Alternatives 1 and 2.

Alternatives 1 and 2 would not meet the criteria of 36 CFR § 212.55 subpart b with respect to minimizing damage to meadows from trails. Alternatives 3, 4, and 5 would meet 36 CFR § 212.55 subpart b with respect to minimizing damage to meadows from trails. Alternatives 3 and 4 would meet 36 CFR § 212.55 subpart b to a greater degree than Alternative 5 with respect to minimizing damage to meadows from trails.

### *Public Motor Vehicle Use*

The analysis of Public Motor Vehicle Use shows that the alternatives differ substantially as to effects to recreation users. Alternatives 1 and 5 result in the highest number of miles of roads and trails rated high in recreation value open to public motorized use initially (95.8 miles). Alternative 3 results in the same number of miles of high value recreation routes designated for public motorized use, however only 55.2 of those miles would be open initially, with an additional 40.6 miles continuing to be part of the NFTS but not designated for public motorized use and identified on a MVUM until corrective actions are analyzed and implemented. Alternative 4 would result in 3.7 miles of high recreation value routes open to public motorized use, with an additional 13.4 miles continuing to be part of the NFTS but not designated for public motorized use and identified on a MVUM until corrective actions or mitigation are analyzed and implemented, and 46.7 miles of high value recreation routes closed to public motor vehicle use. In Alternative 2, No

Action, only the 30 miles of high value recreation routes that were not closed by court order would remain open, with 65.9 miles of high value recreation routes closed to public motorized use.

The effects on 4WD and motorcycle riding opportunities, particularly high country routes over 6,000 feet in elevation, all rated high in recreation value, also vary substantially between alternatives. In Alternatives 1 and 5, 42 miles of 4WD routes, all rated high in recreation value, would be open. Approximately 18.5 miles of high country motorcycle routes would be open, all rated medium to high in recreation value.

In Alternative 3, the same number of high country 4WD trails would be designated for public motorized use, however only 11.2 miles would be open initially, with an additional 30.8 miles added to the MVUM once corrective actions are analyzed and implemented. All of the high country motorcycle trails, approximately 18.5 miles, would be designated open but not added to the MVUM until after corrective actions are analyzed and implemented.

In Alternative 4, 9 miles of high country 4WD trails would remain open, and an additional 7.9 miles of high country 4WD trails would be designated open but not added to the MVUM until after corrective actions and mitigation are analyzed and implemented. Approximately 53 percent of the total 4WD trail opportunities on the Eldorado National Forest over 6,000 feet in elevation would be closed, and all of the high country motorcycle trails, approximately 18.5 miles, representing 90 percent of the total motorcycle trail opportunities on the Eldorado National Forest over 6,000 feet in elevation would be closed.

In Alternative 2, 11.2 miles of high country 4WD trails would remain open, and 30.8 miles of high country 4WD trails would be closed. This equates to the closure of 65 percent of the total 4WD trail opportunities on the Eldorado National Forest over 6,000 feet in elevation. All of the high country motorcycle trails, approximately 18.5 miles, rated medium to high recreation value, would be closed to public motorized use. This represents 90 percent of the total motorcycle trail opportunities on the Eldorado National Forest over 6,000 feet in elevation.

**Table 2.3 Direct Effects to Public Motor Vehicle Use by Alternative**

	<b>Alternative 1 Proposed Action</b>	<b>Alternative 2 No Action</b>	<b>Alternative 3 Preferred Alternative</b>	<b>Alternative 4</b>	<b>Alternative 5</b>
Miles of High Recreation Value Routes open to public motorized use	95.8	30.0	55.2	35.7	95.8
Miles of High Recreation Value Routes open to public motorized use after mitigation	0	0	40.6	13.4	0
Miles of High Recreation Value Routes closed	0	65.9	0	46.7	0
Miles of High Country (all high recreation value) 4WD Trail open	42.1	11.2	11.2	9.0	42.1
Miles of High Country (all high recreation value) 4WD Trail open after mitigation	0	0	30.8	7.9	0
Miles of High Country (all high recreation value) 4WD trail closed	0	30.8	0	25.3	0
Percentage of total High Country 4WD trail on Eldorado NF closed	0	65%	0	53%	0
Miles of High Country (all medium to high recreation value) Motorcycle Trail open	18.5	0	0	0	18.5
Miles of High Country (all medium to high recreation value) Motorcycle Trail Open after mitigation	0	0	18.5	0	0
Miles of High Country (all medium to high recreation value) Motorcycle Trail closed	0	18.5	0	18.5	0
Percentage of total High Country Motorcycle Trail on Eldorado NF closed	0	90%	0	90%	0

### *Newly Proposed Threatened and Endangered Species*

In Alternative 1, Sierra Nevada yellow-legged frogs could be directly and indirectly affected by motor vehicle use on routes 17E24 (east) and 17E28, where they are known to occur. Ten routes would be designated open for public motor vehicle use which could affect proposed critical habitat for the Sierra Nevada yellow-legged frog; 10N01B, 10N13, 16E21, 16E26, 16E27, 17E19, 17E24, 17E28, 17E73, and 19E01. Yosemite toads occur in habitat crossed by routes 09N01 and 19E01, both of which would be designated open for public motor vehicle use. These routes traverse habitat where there is potential for direct impacts to Yosemite toads and for routes to increase sediment delivery or impact meadow hydrology in occupied habitats that have also been recently proposed as critical habitat for the Yosemite toad.

In Alternative 2, under the no action alternative, no direct or indirect effects to Sierra Nevada yellow-legged frogs or Yosemite toads or their proposed critical habitat would result, although the presence of some roads or trails, even without public motor vehicle use on these routes, may continue to impact their habitat until corrective actions are implemented.

In Alternative 3, known occurrences of Sierra Nevada yellow-legged frogs and Yosemite toads would not be directly or indirectly affected by routes that would be immediately opened for public motor vehicle use. Six routes have the potential to influence streams or water bodies that may provide habitat for the Sierra Nevada yellow-legged frog and two routes have the potential to influence habitat for the Yosemite toad, but surveys indicated these species were absent at these sites. Routes that would be opened for public motor vehicle use in Alternative 3 meet Standard and Guideline 100 and would not affect the quality of SNYLF habitat within areas proposed as critical habitat. None of the routes that would be immediately opened in Alternative 3 are within areas proposed as critical habitat for Yosemite toad. Additional routes (or portions of routes) that occur within Sierra Nevada yellow-legged frog or Yosemite toad habitat would remain closed for public motor vehicle use until after corrective actions have been implemented.

Biological assessment and conferencing or consultation with the U.S. Fish and Wildlife Service would occur during future analysis if it is determined that corrective actions or public motor vehicle use on these routes may affect the Sierra Nevada yellow-legged frog or the Yosemite toad or their critical habitats.

In Alternative 4, known occurrences of Sierra Nevada yellow-legged frogs and Yosemite toads would not be directly or indirectly affected by routes that would be immediately opened for public motor vehicle use. Two routes have the potential to influence streams or water bodies that may provide habitat for the Sierra Nevada yellow-legged frog but surveys indicated the species was absent at these sites. 14N05 is the only route

occurring in SNYLF critical habitat, and field review determined this route would not affect habitat elements. None of the routes occur with the range of the Yosemite toad or its critical habitat. As described for Alternative 3, biological assessment and conferencing or consultation with the U.S. Fish and Wildlife Service would occur during future analysis of additional routes, if it is determined that corrective actions or public motor vehicle use on these routes may affect the Sierra Nevada yellow legged frog or the Yosemite toad or their critical habitats.

Alternative 5 would initially have the same effects upon SNYLF and Yosemite toads and their critical habitat as Alternative 1 until corrective actions are taken over a five year period.

## Chapter 3. Affected Environment and Environmental Consequences

This Chapter is limited to updating the affected environment and effects analysis for relevant to the 42 specific routes, meadows, and S&G 100 in the Eldorado National Forest. For affected environment and environmental consequences for the remaining resources, including cumulative effects, the reader is advised to review the Eldorado National Forest Public Wheeled Motorized Travel Management EIS and ROD, March 2008, available on the Eldorado National Forest website

<http://www.fs.usda.gov/eldorado/> or by request from 100 Forni Road, Placerville, CA 95667.

## Hydrology

### Affected Environment

#### Background

The 42 routes are scattered throughout 35 watersheds (HUC 7 scale) in the Eldorado National Forest, and 29 of the routes cross or border meadows (Tables 3.1 and 3.4).

**Table 3.1** Summary of the 42 routes in the Eldorado National Forest.<sup>1</sup>

District	Route number	Number of meadows <sup>2</sup>	Watersheds (HUC 7 scale)
Amador	08N23B	0	Upper Middle Fork Cosumnes River (9,258 acres).
	08N35	0	West Panther Creek (9,258 acres).
	09N01	1	Blue Lakes (5,227 acres); Meadow Creek (4981 acres).
	17E79 (09N04)	0	Upper Bear River (7,888 acres).
	09N08	1	Silver Fork American River – Silver Lake (9,567 acres).
	09N54	0	Clear Creek – Steely Fork Cosumnes River (2,890 acres); Dogtown Creek (6,849 acres).
	16E26 (09N82)	3	Silver Fork American River – Silver Lake (9,567 acres); Lower Summit City Creek (8,754 acres); Ladeux Meadow (4,212 acres); Upper Bear River (7,888 acres); Upper Cole Creek (10,109 acres).
	19E01 (09N83)	2	Blue Lakes (5,228 acres); Lower Deer Creek (2,955 acres).
	09N95	2	Upper Middle Fork Cosumnes River (9,258).
	10N01	1	Caples Lake (8,718 acres).
	10N03	1	Caples Lake (8,718 acres).
	17E16	2	Caples Creek (11,581 acres); Strawberry Creek (7,461 acres); Sayles Canyon (4,265 acres).
	17E19	7	Silver Fork American River – Silver Lake (9,567 acres); Upper Bear River (7,888 acres).
	10N13	2	Caples Creek (11,581 acres).
	17E17	1	Caples Creek (11,581 acres); Strawberry Creek (7,461 acres).
	17E21	1	Upper Silver Fork American River, Silver Fork American River – Silver Lake (9,567 acres); Lower Summit City Creek (8,754 acres).
	17E24	8	Tragedy Creek, Upper Bear River, Ladeaux Meadow (4,212 acres), Silver Fork American River – Silver Lake (9,567 acres); Caples Lake (8,718 acres).
	17E28	6	Upper Bear River (7,888 acres).

<sup>1</sup> Does not include route segments and meadows on private land.

<sup>2</sup> Includes meadows as defined in Table 3.3 - does not include other aquatic features such as streams, narrow strips of alder next to streams, and alder-dominated wetlands. HUC = Hydrologic Unit Code.

**Table 3.1** (continued). Summary of the 42 routes in the Eldorado National Forest.<sup>1</sup>

District	Route number	Number of meadows <sup>2</sup>	Watersheds (HUC 7 scale)
Pacific	16E21 (11N26F)	4	Upper Jones Fork – Silver Creek (6,150), Barrett Lake.
	11N70	0	Lower Silver Creek (6,646 acres); Soldier Creek (3,523 acres); South Fork American River – Fresh Pond (7,025 acres).
	12NY06	3	Union Valley Reservoir (11,357 acres).
	12NY15	0	Little Silver Creek (8,851 acres); Union Valley Reservoir (11,357 acres).
	13N24	0	Rubicon River – Stony Creek (12,542 acres).
	14N27	3	Rubicon River – Little McKinstry meadow (5,761 acres); Upper Gerle Creek (7,940 acres); Rubicon River – Stony Creek (12,542 acres).
	14N05	1	Upper Gerle Creek (7,940 acres) , Loon Lake 5,126 acres.
	14N39	8	Miller Creek (3,163 acres).
	14N58	1	Upper Gerle Creek (7,940 acres).
Placerville	09N15	2	Upper North Fork Cosumnes River (7,514 acres).
	10N06	0	Middle Camp Creek (10,439 acres).
	10N14	1	Caples Creek (11,581 acres).
	10N26	0	Station Creek (2,285 acres), South Fork American River – Forni Creek (5,593 acres); Cody Creek (2,442 acres).
	10N32	0	South Fork American River – Fry Creek (7,842 acres); Beanville Creek (2,356 acres).
	10NY04	0	Long Canyon (7,120 acres).
	10NY05	2	
	10NY06	1	
	16E27 (10N21)	5	
	17E73	8	Strawberry Creek (7,461 acres).
	10N98	2	Headwaters Alder Creek (10,061 acres).
	11N09A	0	Sayles Canyon (4,265 acres); Headwaters South Fork American River (6,691 acres)
	11N22	0	Strawberry Creek (7,461 acres)
	16E33 (11N23F)	1	Bark Shanty Canyon (2,286 acres)
	11NY32	1	Headwaters South Fork American River (6,691 acres)
	17E12	0	South Fork American River – Forni Creek; Strawberry Creek

<sup>1</sup> Does not include route segments and meadows on private land.<sup>2</sup> Includes meadows as defined in Table 3.3 - does not include other aquatic features such as streams, narrow strips of alder next to streams, and alder-dominated wetlands.

## *Analysis Framework*

The scope of analysis is defined by the following Court Order: Case No. 2:09-CV-02523-LKK-JFM (United States District Court, Eastern District of California, filed 7/31/12).

This Court Order requires the Forest Service to analyze 42 specific routes for consistency with the Riparian Conservation Objective (RCO) #2, S&G 100 with respect to meadows.

The Court Order left intact all other portions of the Forest Service's travel management decision, including the parts of the routes that do not intersect meadows. As a

consequence, this analysis focuses on S&G 100, which relates to impacts to meadows.

The 42 routes are listed in Table 3.4, and S&G 100 is provided in full below. Additional hydrologic topics were analyzed in the 2008 TM EIS and ROD. Please refer to the 2008 TM EIS for an analysis of water quality, cumulative watershed effects, streams, and wetlands.

### Standard & Guideline 100:

*“Maintain and restore the hydrologic connectivity of streams, meadows, wetlands, and other special aquatic features by identifying roads and trails that intercept, divert, or disrupt natural surface and subsurface water flow paths. Implement corrective actions where necessary to restore connectivity.”*

## *Data and Analysis Methods*

### **Meadow Survey Results**

The 42 routes were surveyed in the Eldorado National Forest (ENF) in 2011 and 2012 in order to: 1) locate the meadows that border or cross the 42 routes, and 2) determine whether those meadows and associated routes are in compliance with S&G 100 of the Sierra Nevada Forest Plan Amendment Record of Decision (SNFPAROD 2004) as it pertains to meadows.

A summary of the survey results is described below and in Table 3.2 and Figure 3.1.

- 81 of the surveyed features in the ENF were classified as meadows and 34 of the features were not classified as meadows (Figures 3.2 and 3.3). The features that were not classified as meadows included alder-dominated wetlands, narrow strips of alder adjacent to streams, forested areas with or without shrubs, and areas of shrubs without trees.
- 14 routes do not cross or border meadows. As a result, S&G 100 does not apply to these routes with regard to meadows.
- 10 routes meet S&G 100. This is because these routes cross and/or border meadows that meet S&G 100.
- 18 routes do not meet S&G 100. This is because these routes have affected the hydrology of a total of 38 meadows such that S&G 100 was not being met.

A description of the field surveys, which includes the definitions and methodology used, is in Table 3.3. A summary of the field survey results for individual routes is in Table 3.4; a summary of the meadows that do not meet S&G 100 is in Table 3.5; two examples of field surveys are in Figures 3.4 through 3.8. All of the field survey forms are included in the Project Record.

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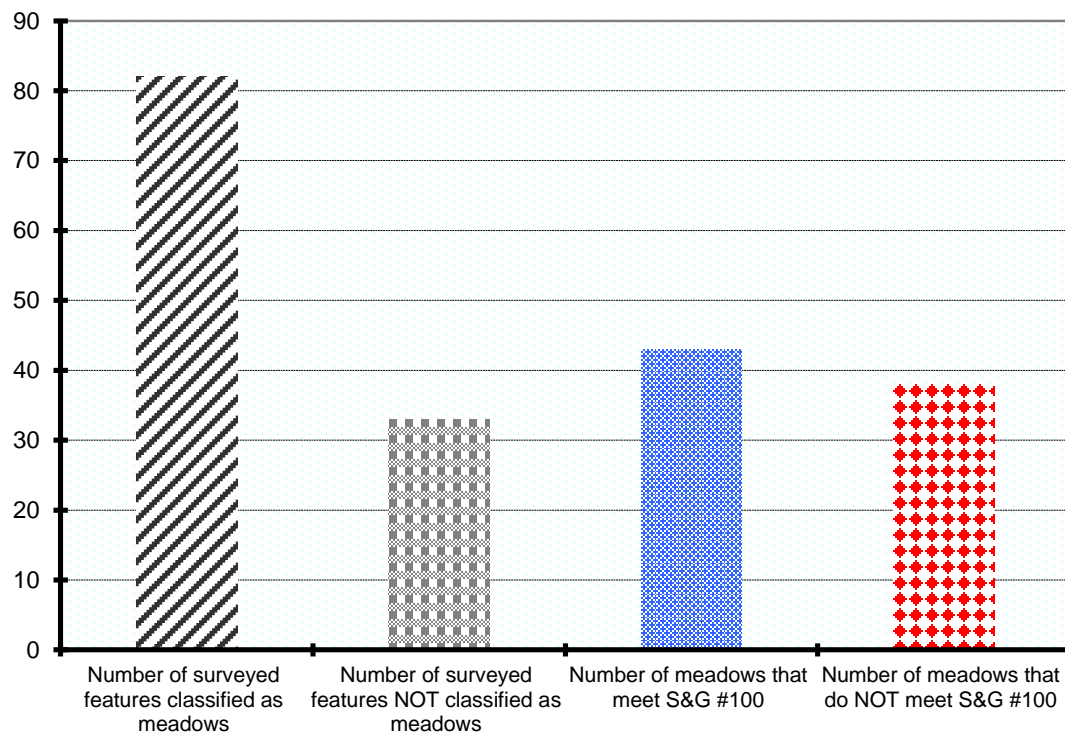
<sup>1</sup> Most of the field surveys were complete in 2011. Field surveys were completed by Steve Markman, Hydrologist, and Ryan Lockwood, Hydrologic Technician.

**Table 3.2** Summary of the field surveys of the 42 routes in 2011 and 2012 in the Eldorado National Forest.

	List of routes <sup>1</sup>	Number of routes
<b>Routes that do <u>not</u> cross or border meadows on National Forest land</b>	08N23B, 08N35, 17E79 (09N04), 09N54, 10N06, 10N26, 10N32, 10NY04, 11N09A, 11N22, 11N70, 12NY15, 13N24, 17E12.	14
<b>Routes that cross or border meadows that meet Standard &amp; Guideline 100.</b>	09N15, 10N03, 10NY05, 10NY06, 12NY06, 14N05, 14N27, 14N58, 17E17, 17E21.	10
<b>Routes that cross or border at least one meadow that does <u>not</u> meet Standard &amp; Guideline #100.</b>	09N01, 09N08, 16E26 (09N82), 19E01 (09N83), 09N95, 10N01, 17E73 (10N13), 10N14, 16E27 (10N21), 10N98, 16E33 (11N23F), 16E21 (11N26F), 11NY32, 14N39, 17E16, 17E19, 17E24, 17E28.	18

<sup>1</sup> Alternate route numbers are shown in parenthesis.

**Figure 3.1** Summary of the field surveys of meadows in 2011 and 2012 in the Eldorado National Forest. (S&G 100 = Standard & Guideline 100).



**Table 3.3** Description of the field surveys of meadows in the Eldorado National Forest in 2011 and 2012.<sup>1</sup>

<b>Purpose of field surveys</b>	To determine if specific road or trail segments are causing adjacent meadows to not meet Standard and Guideline 100 of the Sierra Nevada Forest Plan Amendment of 2004.
<b>Standard and Guideline 100</b>	<i>“Maintain and restore the hydrologic connectivity of streams, meadows, wetlands, and other special aquatic features by identifying roads and trails that intercept, divert, or disrupt natural surface and subsurface water flow paths. Implement corrective actions where necessary to restore connectivity.”</i>
<b>Definition of a meadow<sup>2</sup></b>	<i>“A meadow is defined as a grassy opening, 0.1 acres or larger, dominated by perennial sedges, rushes, and grasses (wet meadow) or perennial grasses and forbs (dry meadow).”</i>
<b>Characteristics of a meadow<sup>3</sup></b>	<ul style="list-style-type: none"> <li>✓ <i>“A meadow is an ecosystem type composed of one or more plant communities dominated by herbaceous species.</i></li> <li>✓ <i>It supports plants that use surface water and/or shallow groundwater (generally at depths of less than one meter).</i></li> <li>✓ <i>Woody vegetation, like trees or shrubs, may occur and be dense but are not dominant.”</i></li> </ul>
<b>Definition of hydrologic connectivity</b>	The hydrologic connectivity of a meadow exists when the surface and subsurface flow of water through the meadow has not been visibly altered by the road or trail segment.
<b>Methodology<sup>4</sup></b>	<p><u>Description</u></p> <p>A field survey form for meadows was developed specifically to evaluate compliance with Standard &amp; Guideline 100. The questions on page 2 of the survey form are specific to <i>visible or noticeable evidence of alteration of the surface and subsurface flow of water through the meadow</i>. The questions are qualitative, require hydrologic knowledge and field experience to answer, and are based on features that are visible at the ground surface, but reflect surface and subsurface water flow characteristics as described in the criteria below.<sup>4</sup></p> <p><u>Assumptions</u></p> <ul style="list-style-type: none"> <li>• The mere presence of a road or trail through or adjacent to a meadow (on-the-ground) does <u>not</u> determine if Standard and Guideline 100 is being met. This is because it is possible for a road or trail to occur within or adjacent to a meadow without a visible alteration of surface or subsurface flow of water into or through the meadow.</li> <li>• A disruption of surface and/or subsurface flow in the meadow by a road or trail would result in evidence that can be seen at the surface, such as changes in vegetation, presence of deposited sediment, gullies, incised stream channels, etc.</li> </ul> <p><u>Criteria for rating Standard &amp; Guideline 100</u></p> <p>Roads and trails were rated as <u>not</u> meeting Standard &amp; Guideline 100 if field evidence was visible that shows one or more of the following:</p> <ul style="list-style-type: none"> <li>• The road or trail intercepts and diverts surface and/or subsurface water from the meadow and routes the water away from the meadow such that the meadow has decreased in size and/or wetness.</li> <li>• Runoff from the road or trail has eroded sediment into the meadow such that the size and/or wetness of the meadow has been reduced.</li> <li>• Runoff from the road or trail has caused a stream channel to downcut such that the water table next to the stream has dropped and the size and/or the wetness of the meadow has decreased.</li> </ul>

<sup>1</sup> Most of the field surveys were completed in 2011. Field surveys were completed by Steve Markman, Hydrologist, and Ryan Lockwood, Hydrologic Technician.

<sup>2</sup> As quoted from the *Land Resource Management Plan for the Eldorado National Forest* of 1989.

<sup>3</sup> As quoted from the *Meadow Hydrogeomorphic Types for the Sierra Nevada and Southern Cascade Ranges in California* (USDA 2011).

<sup>4</sup> The methodology was created by Steve Markman, Hydrologist, Eldorado National Forest. The detailed inventory method described in *Groundwater-Dependent Ecosystems (General Technical Report WO-86a, March 2012)* does not include a survey form that is specific to evaluating Standard and Guideline 100 of the 2004 Sierra Nevada Forest Plan Amendment.

**Table 3.4** Summary of the field survey results in 2011 and 2012 for the 42 routes in the Eldorado National Forest.<sup>1</sup>

Route number	Surveyed by	Number of surveyed features crossed or bordered by route	Number of surveyed features that were <u>not</u> classified as meadows	Do all meadows meet S&G 100?	Number of meadows that do <u>not</u> meet S&G 100	Number of meadows that meet S&G 100	Alternate route number and name
<b>Routes that do <u>not</u> cross or border meadows</b>							
08N23B	SM	2	2	N/A	0	0	Prothro Headwater
08N35	SM	0	0	N/A	0	0	Upper West Panther
17E79	RL	0	0	N/A	0	0	09N04; Pardoe 4WD
09N54	RL	0	0	N/A	0	0	Leoni Meadows
10N06	RL	1	1	N/A	0	0	Pebble Ridge
10NY04	RL	1	1	N/A	0	0	Middle Long Canyon
10N26	RL	3	3	N/A	0	0	Sciots Creek
10N32	RL	0	0	N/A	0	0	South Beanville Creek
11N09A	SM	1	1	N/A	0	0	Bryan Creek
11N22	RL	1	1	N/A	0	0	Strawberry Creek
11N70	SM	0	0	N/A	0	0	McManus
12NY15	RL	2	2	N/A	0	0	West Robbs Creek
13N24	RL	1	1	N/A	0	0	Dry Lakes
17E12	SM	1	1	N/A	0	0	Lovers Leap motorcycle trail
<b>Routes that cross or border meadows that meet Standard &amp; Guideline 100</b>							
09N15	RL	1	0	Yes	0	1	Leeks Springs Valley
10N03	SM	1	0	Yes	0	1	Devil's Gate Summer Home
10NY05	RL	2	0	Yes	0	2	Rocky road
10NY06	SM	2	1	Yes	0	1	Upper Long Canyon
12NY06	SM	3	0	Yes	0	3	Crystal Shortcut
14N05	SM	3	2	Yes	0	1	McKinstry
14N27	RL	6	3	Yes	0	3	Bunker Meadow
14N58	SM	2	1	Yes	0	1	Jerret
17E17	RL	3	2	Yes	0	1	Bucks Pasture motorcycle trail
17E21	RL	1	0	Yes	0	1	Horse Canyon trail

<sup>1</sup> RL = Ryan Lockwood, Hydrologic Technician. SM = Steve Markman, Hydrologist. S&G = Standard and Guideline. N/A = not applicable.

**Table 3.4 (continued)** Summary of the field survey results in 2011 and 2012 for 42 routes in the Eldorado National Forest.<sup>1</sup>

Route number	Sur-veyed by	Number of surveyed features crossed or bordered by route	Number of surveyed features that were <u>not</u> classified as meadows	Do all meadows meet S&G 100?	Number of meadows that do <u>not</u> meet S&G 100	Number of meadows that meet S&G 100	Alternative route number and name
<b>Routes that cross or border at least one meadow that does <u>not</u> meet Standard &amp; Guideline #100.</b>							
09N01	RL	1	0	No	1	0	Blue Lakes
09N08	SM	1	0	No	1	0	Stockton Camp
16E26	RL	5	2	No	2	1	09N82
19E01	RL	2	0	No	1	1	09N83; Clover Valley/Deer Valley Trail
09N95	SM	2	0	No	1	1	Cosumnes Head (paved)
10N01	RL	1	0	No	1	0	10N01B; spur off Woods Lake
10N13	SM	2	0	No	1	1	Schneider Camp Road;
17E73	SM	9	1	No	2	6	Strawberry 4WD trail
10N14	RL	1	0	No	1	0	Mule Canyon
16E27	SM	5	0	No	4	1	10N21; Long Canyon 4WD trail
10N98	RL	2	0	No	2	0	John Quinn Spur
16E33	RL	1	0	No	1	0	11N23F; North Shanty Spur
16E21	RL	7	3	No	3	1	11N26F; Barrett Lake 4WD trail
11NY32	RL	1	0	No	1	0	47 Milestone
14N39	SM	9	0	No	4	5	Richardson Lake 4WD
17E16	RL	5	3	No	2	0	Little Round Top
17E19	RL	7	0	No	5	2	Allens Camp Motorcycle trail
17E24	SM	8	0	No	4	4	Carson Emigrant trail
17E28	RL	9	3	No	1	5	Mud Lake trail

<b>Total number</b>	<b>115</b>	<b>34</b>	<b>38</b>	<b>43</b>
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<sup>1</sup> RL = Ryan Lockwood, Hydrologic Technician. SM = Steve Markman, Hydrologist. S&G = Standard and Guideline. N/A = not applicable.

**Table 3.5** Summary of the 38 meadows that do not meet Standard & Guideline 100.

Reason number(s)	Description of the reason(s) that the meadow does not meet Standard & Guideline 100	Meadow reference number(s) <sup>1,2,3</sup>
<b>1</b>	The road or trail intercepts and diverts surface and/or subsurface water from the meadow and routes the water away from the meadow such that the meadow has decreased in size and/or wetness.	14N39-5.
<b>2</b>	Runoff from the road or trail has eroded sediment into the meadow such that the size and/or wetness of the meadow has been reduced.	9N82-1, 9N82-7, 9N95-1, 16E21-1, 11NY32-1, 14N39-1.
<b>3</b>	Runoff from the road or trail has caused a stream channel to downcut such that the water table next to the stream has dropped and the size and/or the wetness of the meadow has decreased.	9N82-3, 9N83-3, 11N23F-1, 14N39-7, 17E16-3, 17E16-4, 17E19-1, 17E19-5, 17E19-7, 17E28-7.
<b>1 and 2</b>	See above descriptions.	10N13-3, 10N13-6, 10N21-1, 10N21-2, 10N21-3, 10N21-4, 17E24-5.
<b>1 and 3</b>		16E21-6.
<b>2 and 3</b>		10N01-3, 10N14-1, 10N98-1, 10N98-2, 16E21-5, 17E19-2, 17E19-4, 17E24-3, 17E24-4.
<b>1 and 2 and 3</b>		9N01-all, 9N08-1, 10N13-11.

<sup>1</sup> Meadows are grouped according to the *primary* reason or reasons that they do not meet Standard & Guideline 100.

<sup>2</sup> The name of each meadow corresponds to the *meadow reference number* on the field surveys of 2011 and 2012.

<sup>3</sup> Meadows are numbered sequentially along each route. For example, meadow 9N82-3 was the third meadow that was encountered along route 9N83.

**Figure 3.2** Feature 12NY06-2, classified as a meadow, and rated as meeting Standard & Guideline 100.

Road 12NY06 is located approximately 200 feet from the meadow and has no visible effect on the surface and subsurface flow in the meadow or sediment delivery into the meadow. As a result, the meadow was rated as meeting Standard & Guideline 100. *July 2011.*



**Figure 3.3** Feature 17E73-1 (10N13-1), classified as an alder-dominated wetland, and not rated in terms of Standard & Guideline 100. *September 2011.*



**Figure 3.4.** Meadow 17E73-3 (10N13-3), rated as not meeting Standard & Guideline 100.

A 0.2 mile long mile segment of trail 17E73 (Strawberry 4WD trail) crosses a nearly continuous series of wet meadows at approximately 2.5 miles from the beginning of the trail. The trail intercepts and re-routes surface and subsurface water throughout nearly the entire trail segment, as well as eroding sediment from the trail into meadows. *July 2011.*



**Figure 3.5** Field survey form (page 1) for meadow 17E73-3 (10N13-3).**Field Survey for Meadows and Roads <sup>1</sup>**

<b>Forest:</b> Eldorado National Forest	<b>District:</b> Placerville	<b>County:</b>
<b>Observers:</b> Steve Mackman, Hydrologist		<b>Date:</b> August 2, 2011 <b>Time:</b> 1430
<b>Number and/or name of road or trail:</b> 17E73 (10N13)	<b>UTM start:</b> 10 S 0753133 4293392	
<b>Meadow reference number:</b> 17E73-3 (10N13-3)	<b>UTM end:</b> 10 S 0753152 4293727	
<p><b>Characteristics of meadow</b></p> <p>Is the feature a meadow? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No (Describe what the feature actually is)</p> <p>Does the location of the meadow on-the-ground match the information in GIS? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No (If the answer is no, please describe the difference.) Approx 1,000 ft. length of trail 17E73 is bordered by wet meadow on both sides of trail.</p> <p><b>Wetness of meadow</b> (Select the best answer at the time of the survey)  <input type="checkbox"/> Very wet (Standing or flowing surface water present in all or a large portion of feature).  <input checked="" type="checkbox"/> Moderately wet (Surface water in part of feature and/or ground surface wet in most of feature).  <input type="checkbox"/> Slightly wet (No surface water. Ground surface wet in part of feature).  <input type="checkbox"/> Mostly dry (No surface water. Ground surface dry in most of feature).  <input type="checkbox"/> Dry (No surface water. Ground surface dry in entire feature).</p>		
<p><b>Predominate riparian/wetland vegetation:</b> Skunk cabbage, alder</p> <p><b>Abundance and location:</b> Thick on both sides of road</p>		<p><b>Predominant non-riparian/wetland vegetation:</b> Fir, lodgepole pine</p> <p><b>Abundance and location:</b> Thick next to wet meadow areas</p>
<p><b>Proximity and characteristics of motorized routes in the meadow</b></p> <p>Does the road or trail enter the meadow? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Approx. feet or miles 1000 feet (Describe the location of the road or trail with respect to hydrologic features in the meadow.) Approximately 1,000 feet of trail goes through wet meadow areas.</p> <p>Does the road or trail parallel a portion of the meadow (within 100 ft. of the edge of the meadow)? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No (Describe the distance that the road or trail parallels the meadow, and attach photos.)</p> <p>Is there evidence of motorized use off of the road or trail and into the meadow? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No (Describe the evidence, and attach photos.) Tire tracks just off of road, less than 20 feet from road.</p> <p>Are there stream channel crossings along the road in the meadow? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Pipes/culverts <input type="checkbox"/> Bridge <input checked="" type="checkbox"/> Raw crossings two stream channel crossings</p> <p>Are there cross drain structures along the road or trail in the meadow? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Pipes/culverts <input type="checkbox"/> Rolling dip</p>		

<sup>1</sup> Use a separate form for each road or trail.

(July 25, 2011)

Figure 3.5 (continued). Field survey form (page 2) for meadow 17E73-3 (10N13-3).

**Field Survey for Meadows and Roads (page 2)**  
 17E73-3 8-2-11 Steve Marking  
 (10N13-3)

<b>Condition of meadow</b> (10N13-3)	
Active erosion features (rills, gullies, headcuts) in meadow?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <i>(If yes, describe the type, number, size, and location of the erosional features and whether they appear to be related to the road or trail.)</i> Runoff from the trail has created a number small channels (< 0.5 ft. deep) in the meadow areas on the downslope side of the trail.
Old, healed erosional features in meadow?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <i>(If yes, describe the type, number, size, and location of the erosional features and whether they appear to be related to the road or trail.)</i>
Hummocky surface in portions of the meadow?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <i>(If yes, describe location and aerial extent in meadow).</i>
If the road(s) or trail(s) goes through the meadow, is the road/trail noticeably affecting the movement of water through the meadow?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <i>(If yes, describe the physical evidence).</i> Water is flowing down most of the 1,000 foot segment of the trail that goes through the meadow areas.
If the road(s) or trail(s) parallels a portion of the meadow, is the road/trail noticeably affecting the movement of water into or out of the meadow?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <i>(If yes, describe the evidence).</i>
Is a road(s) or trail(s) contributing sediment into the meadow to the extent that it is noticeably affecting the size and/or function of the meadow?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <i>(If yes, describe the physical evidence).</i> Rills occur throughout the 1,000 ft. segment of the trail. Several plumes of sediment from trail into meadow, causing areas in meadow to be less wet.
<b>Other land disturbances within the meadow?</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <i>(If yes to the above, describe types and extent).</i>	
<b>Stream flowing through the meadow?</b>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No 2 streams flow through the meadow areas.
Is stream eroding vertically (i.e. active downcutting)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Is stream eroding laterally (i.e. actively widening)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No } minor channel erosion of 2 streams downstream of trail.
Does stream contain an active headcut(s)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Does stream contain old (healed) headcut(s)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b>Aquatic species (incidental sightings only – no survey to a specific protocol)</b>	
List aquatic species present, numbers of individuals, and life stage None observed.	
<b>Findings with respect to Standard and Guideline (S&amp;G) #100 of the SNFPA</b>	
<input type="checkbox"/> Yes. S&G #100 is being met with regard to this road/trail and meadow.	
<input checked="" type="checkbox"/> No. S&G #100 is NOT being met with regard to this road and meadow.	
<input type="checkbox"/> I. Inconclusive. Field evidence not sufficient to determine if S&G #100 is being met.	
<b>S&amp;G 100:</b> Maintain and restore the hydrologic connectivity of streams, meadows, wetlands, and other special aquatic features by identifying roads and trails that intercept, divert, or disrupt natural surface and subsurface water flow paths. Implement corrective actions where necessary to restore connectivity.	
<b>Other Comments</b> 1,000 ft. segment of trail 17E73 intercepts surface and groundwater from adjacent wet meadow areas. Runoff flowing down much of 1,000 ft. trail segment causing erosion of the trail and depositing sediment into adjacent meadow areas; this in turn is causing areas in meadow to be less wet and shrinking the size of the meadow areas over time.	

**Figures 3.6 and 3.7** Meadow 17E24-5, rated as not meeting Standard & Guideline 100.

Trail 17E24 crosses two small wet meadows near the west side of Squaw Ridge. The trail intercepts surface and subsurface water from both meadows and routes water down the road. In addition, runoff from the trail has eroded sediment from the trail into the meadows.



Figure 3.8. Field survey form (page 1) for meadow 17E24-5.

Field Survey for Meadows and Roads<sup>1,2</sup>

Forest: Eldorado National Forest	District: Amador	County:
Observers: Steve Markman, Hydrologist		Date: Sept. 16, 2012 Time:
Number and/or name of road or trail: 17E24.	UTM 6.8 and 6.9 miles from start of road. 10S 075234 ; 4278178	
Meadow reference number: 17E24-5	10S 0752526 ; 4278219	

Characteristics of meadow	
Is the feature a meadow? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No (Describe what the feature actually is) Two separate small meadows, less than 0.1 miles apart.	
Does the location of the meadow on-the-ground match the information in GIS? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No (If the answer is no, please describe the difference). Not shown in GIS.	
Wetness of meadow <input type="checkbox"/> Very wet (Standing or flowing surface water present in all or a large portion of feature). (Select the best answer at the time of the survey) <input type="checkbox"/> Moderately wet (Surface water in part of feature and/or ground surface wet in most of feature). <input checked="" type="checkbox"/> Slightly wet (No surface water. Ground surface wet in part of feature). <input checked="" type="checkbox"/> Mostly dry (No surface water. Ground surface dry in most of feature). <input type="checkbox"/> Dry (No surface water. Ground surface dry in entire feature).	
Predominate riparian/wetland vegetation: Willow, corn lily, grasses Abundance and location: Throughout meadow.	Predominant non-riparian/wetland vegetation: Lodgepole pine surrounding meadow. Abundance and location:
Proximity and characteristics of motorized routes in the meadow	
Does the road or trail enter the meadow? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Approx. feet or miles 600 feet (Describe the location of the road or trail with respect to hydrologic features in the meadow.) A total of 600 feet for both meadows.	
Does the road or trail parallel a portion of the meadow (within 100 ft. of the edge of the meadow)? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No (Describe the distance that the road or trail parallels the meadow, and attach photos.)	
Is there evidence of motorized use off of the road or trail and into the meadow? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No (Describe the evidence, and attach photos.)	
Are there stream channel crossings along the road in the meadow? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Pipes/culverts <input type="checkbox"/> Bridge <input checked="" type="checkbox"/> Raw crossing 1 stream crossing.	
Are there cross drain structures along the road or trail in the meadow? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Pipes/culverts <input type="checkbox"/> Rolling dip	

<sup>1</sup> Use a separate survey form for each road or trail and meadow or wetland.<sup>2</sup> Survey is intended for meadows that are greater than 0.1 acres in size.

(July 11, 2012)

Figure 3.8 (continued). Field survey form (page 2) for meadow 17E24-5.

**Field Survey for Meadows and Roads (page 2)**

17E24-5      S. Markman      9-16-12

<b>Condition of meadow</b>	
Active erosion features (rills, gullies, headcuts) in meadow? (If yes, describe the type, number, size, and location of the erosional features and whether they appear to be related to the road or trail.)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Denuded areas in both meadows.
Old, healed erosional features in meadow? (If yes, describe the type, number, size, and location of the erosional features and whether they appear to be related to the road or trail.)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Hummocky surface in portions of the meadow? (If yes, describe location and aerial extent in meadow).	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If the road(s) or trail(s) goes through the meadow, is the road/trail noticeably affecting the movement of water through the meadow? (If yes, describe the physical evidence).	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Road cuts through both meadows, intercepts groundwater from the meadow and routes groundwater down the road.
If the road(s) or trail(s) parallels a portion of the meadow, is the road/trail noticeably affecting the movement of water into or out of the meadow? (If yes, describe the evidence).	<input type="checkbox"/> Yes <input type="checkbox"/> No N/A
Is a road(s) or trail(s) contributing sediment into the meadow to the extent that it is noticeably affecting the size and/or function of the meadow? (If yes, describe the physical evidence).	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Sediment from road can be traced into both meadows.
Other land disturbances within the meadow? (If yes to the above, describe types and extent).	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Cattle grazing.
Stream flowing through the meadow?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Is stream eroding vertically (i.e. active downcutting)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Is stream eroding laterally (i.e. actively widening)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Does stream contain an active headcut(s)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Does stream contain old (healed) headcut(s)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b>Aquatic species (incidental sightings only – no survey to a specific protocol)</b>	
List aquatic species present, numbers of individuals, and life stage None observed.	
<b>Findings with respect to Standard and Guideline (S&amp;G) #100 of the SNFPA</b>	
<input type="checkbox"/> Yes. S&G #100 is being met with regard to this road/trail and meadow.	
<input checked="" type="checkbox"/> No. S&G #100 is NOT being met with regard to this road and meadow.	
<input type="checkbox"/> I. Inconclusive. Field evidence not sufficient to determine if S&G #100 is being met.	
<b>S&amp;G 100:</b> Maintain and restore the hydrologic connectivity of streams, meadows, wetlands, and other special aquatic features by identifying roads and trails that intercept, divert, or disrupt natural surface and subsurface water flow paths. Implement corrective actions where necessary to restore connectivity.	
<b>Other Comments</b> Both meadows have been recently grazed by cattle.	

## Environmental Consequences

### Effects Common to All Alternatives

There are 14 routes where S&G 100 is not applicable with regard to meadows. This is because field surveys in 2011 and 2012 determined that these 14 routes do not cross or border a meadow in the Eldorado National Forest (ENF). The definition and characteristics of a meadow is described in Table 3.3. The 14 routes are: 08N23B, 08N35, 17E79 (09N04), 09N54, 10N06, 10N26, 10N32, 10NY04, 11N09A, 11N22, 11N70, 12NY15, 13N24, and 17E12.

There are 10 routes where S&G 100 would be met. This is because field surveys in 2011 and 2012 determined that all meadows that cross or border these 10 routes meet S&G 100. The reason that these meadows meet S&G 100 is because the following conditions were met at the time of the field surveys:

- The road or trail does not intercept and divert surface and/or subsurface water from the meadow and route the water away from the meadow such that the meadow has decreased in size and/or wetness.
- Runoff from the road or trail has not eroded sediment into the meadow such that the size and/or wetness of the meadow has decreased.
- Runoff from the road or trail has not caused a stream channel to downcut such that the water table next to the stream has dropped and the size and/or the wetness of the meadow has decreased.

The 10 routes where S&G 100 would be met are: 09N15, 10N03, 10NY05, 10NY06, 12NY06, 14N05, 14N27, 14N58, 17E17, and 17E21. The methodology used to evaluate compliance with S&G 100 is described in more detail in Table 3-6.

Most of the 18 routes that do not meet S&G 100 will likely not do so for at least several years. The primary reason is that a detailed plan of corrective actions (to attain compliance with S&G 100) for most of the 18 routes does not currently exist, and would require at least several years to both develop and implement. The 18 routes are: 09N01, 09N08, 16E26 (09N82), 19E01 (09N83), 09N95, 10N01, 17E73 (10N13), 10N14, 16E27 (10N21), 10N98, 16E33 (11N23F), 16E21 (11N26F), 11NY32, 14N39, 17E16, 17E19, 17E24, and 17E28.

Adverse impacts would likely continue to occur for a period of time (the length of time varies by alternative) to the 38 meadows that are crossed and/or bordered by the 18 routes listed above. The reason is that the closure of a route to motorized public use for any period of time, by itself, does not correct the reason(s) that the route is causing a meadow(s) to not meet S&G 100. For example, a route that intercepts surface and/or subsurface water from a meadow and directs that water down the route and away from

the meadow will continue to do so after vehicles are not allowed on the route. Two examples of this - meadows 17E73-3 and 17E34-5 - are described in *Affected Environment, Figures 3.4 through 3-8*. The adverse impacts to each meadow would likely include one or more of the following:

- The road or trail would continue to intercept and divert surface and/or subsurface water from the meadow and route the water away from the meadow such that the size and/or wetness of the meadow is decreased.
- Runoff from the road or trail would continue to erode sediment into the meadow such that the size and/or wetness of the meadow would decrease.
- Runoff from the road or trail would cause additional stream channel downcutting – this would cause the water table next to the stream to continue to drop and the size and/or the wetness of the meadow would continue to decrease.

Since the completion of the 2008 TM FEIS ROD, the Pacific Southwest Region of the U.S. Forest Service developed a number of new Best Management Practices (BMPs) applicable to roads and trails. In general, compliance with S&G 100 results in compliance with the new BMPs that are relevant to the alternatives of this SEIS.<sup>1</sup> The new BMPs for roads and trails in the 2011 WQMH contain specific measures that restore or improve hydrologic connectivity of meadows. The new relevant BMPs for roads and trails in the 2011 WQMH are summarized below, and the reader is referred to the 2011 WQMH for the complete text of BMPs and background information.

- BMP 4.7.1, item #3a-b (Planning). The objective of this BMP is to use the travel management planning process to develop measures to avoid or minimize adverse impacts to aquatic resources from trails. The BMP describes a number of practices to achieve this objective, including the identification of trail segments causing adverse impacts and the prioritization of mitigation measures to minimize those impacts. This SEIS has identified ten trails causing adverse impacts to meadows, and has identified three alternatives (Alternatives 3, 4, and 5) to address those impacts. The mitigation measures to address those impacts, as described in the BMP, could include the relocation of existing trails or trail segments away from meadows, reconstruction of trails to improve effective drainage, as well as other measures.

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<sup>1</sup> These BMPs are found in the 2011 Water Quality Management Handbook (WQMH). The 2008 TM EIS and ROD issued under the WQMH of 2000; this SEIS is under the WQMH of 2011. The 2011 WQMH handbook contains additional BMPs for roads and trails.

- BMP 4.7.2 (Trail Location and Design). The objective of this BMP is to reduce the risk that runoff and sediment originating from designated OHV trails will enter watercourses and water bodies. To achieve this objective, this BMP provides that trails should be located to minimize [effects to] hydrologic connectivity and that drainage structures should be incorporated into trail design to disperse concentrated runoff. None of the alternatives propose the construction of new trails; however, several of the alternatives consider future implementation of corrective measures to address adverse impacts to meadows from trails. Accordingly, this BMP will be considered and applied at the time the Eldorado National Forest proposes specific corrective measures.
- BMP 2.1, item 6 (Travel Management and Planning Analysis). The objective of this BMP is to use the road management planning process to develop measures to avoid or minimize adverse impacts to aquatic resources from existing roads. The BMP identifies a number of practices to achieve this objective, including the identification of roads causing resource or watershed impacts and the identification and prioritization of mitigation measures. This travel management analysis has identified adverse impacts to meadows associated with existing roads. Future analyses will focus on developing appropriate mitigation measures to address these impacts.

### **Alternative 1: Proposed Action**

There are 18 routes – the same 18 routes that contained at least one meadow that did not meet S&G 100 - where S&G 100 would no longer apply. This is because a *Forest Plan Amendment* would exempt these 18 routes from S&G 100. The 18 routes are: 09N01, 09N08, 16E26 (09N82), 19E01 (09N83), 09N95, 10N01, 17E73 (10N13), 10N14, 16E27 (10N21), 10N98, 16E33 (11N23F), 16E21 (11N26F), 11NY32, 14N39, 17E16, 17E19, 17E24, and 17E28.

Adverse impacts would likely continue to occur for an indefinite period of time to 38 meadows that are crossed and/or bordered by the 18 routes listed above. This is because Alternative 1 does not require that corrective actions be implemented on the 18 routes within any specific time period in order to bring those routes into compliance with S&G 100 and allows public motorized vehicle use of those routes. The adverse impacts to each meadow have been previously described in paragraph 4 of *Effects Common to Alternatives*.

Adverse impacts to the 38 meadows that are crossed and/or bordered by the 18 routes listed above would likely be greater from Alternative 1 than Alternatives 3, 4, and 5.

There are three reasons - when combined together - that support this conclusion.

- Alternative 1 does not require that corrective actions be implemented on the 18 routes in order to bring those routes into compliance with S&G 100.
- Alternative 1 allows public motorized vehicle use of those 18 routes, and there are no restrictions on the amount or time period of use.
- The research has generally shown that an increase in the amount of vehicle use on native surface roads and trails leads to an increase in sediment production and changes in runoff from those roads and trails – this research was documented in the 2008 TM FEIS.

### **Alternative 2: No Action**

There are 18 routes - the same 18 routes that cross and/or border at least one meadow that did not meet S&G 100 - where S&G 100 would not be met. This is because Alternative 2 (No Action) does not require that a plan of corrective actions for the 18 routes be developed in order to attain compliance with S&G 100. The 18 routes are: 09N01, 09N08, 16E26 (09N82), 19E01 (09N83), 09N95, 10N01, 17E73 (10N13), 10N14, 16E27 (10N21), 10N98, 16E33 (11N23F), 16E21 (11N26F), 11NY32, 14N39, 17E16, 17E19, 17E24, and 17E28.

Adverse impacts would likely continue to occur for an indefinite period of time to the 38 meadows that are crossed and/or bordered by the 18 routes listed above. This is because Alternative 2 does not require that corrective actions be implemented on the 18 routes in order to bring those routes into compliance with S&G 100. The adverse impacts to each meadow have been previously described in paragraph 4 of *Effects Common to Alternatives*.

Adverse impacts to the 38 meadows that are crossed and/or bordered by the 18 routes listed above would likely be greater from Alternative 2 than alternatives 3, 4, and 5.

There are two reasons - when combined together - that support this conclusion.

- Alternative 2 does not require that corrective actions be implemented on the 18 routes in order to bring those routes into compliance with S&G 100. Alternatives 3, 4, and 5 contain such a requirement.

### Alternative 3

There are 18 routes - the same 18 routes that cross and/or border at least one meadow that did not meet S&G 100 - where S&G 100 would be met after corrective actions to the routes have been implemented and the Forest Service has determined that the routes are consistent with S&G 100. The corrective actions could include one or more of the following:

- Relocation of route segments away from meadows and the subsequent removal of unnecessary route segments near meadows.
- Reconstruction of route segments to direct runoff (and sediment) away from meadows.
- Road or trail improvements in meadows to prevent the interception and diversion of surface and subsurface water.
- Structures in route segments that enable vehicles to be suspended above meadows.

Adverse impacts would likely continue to occur to 38 meadows until the corrective actions to these 18 routes have been implemented. The adverse impacts to each meadow would include one or more of the following:

- The road or trail would continue to intercept and divert surface and/or subsurface water from the meadow and route the water away from the meadow such that the size and/or wetness of the meadow is decreased.
- Runoff from the road or trail would continue to erode sediment into the meadow such that the size and/or wetness of the meadow would decrease.
- Runoff from the road or trail would cause additional stream channel downcutting – this would cause the water table next to the stream to continue to drop and the size and/or the wetness of the meadow would continue to decrease.

The 18 routes are: 09N01, 09N08, 16E26 (09N82), 19E01 (09N83), 09N95, 10N01, 17E73 (10N13), 10N14, 16E27 (10N21), 10N98, 16E33 (11N23F), 16E21 (11N26F), 11NY32, 14N39, 17E16, 17E19, 17E24, and 17E28.

It is likely that the corrective actions would be implemented, however, due to public desire to have these routes brought into compliance with S&G 100 and reopened for public motor vehicle use.

## Alternative 4

The effects of Alternative 4 are similar to those described under Alternative 3, with a few differences as described below.

Adverse effects to 29 meadows crossed and/or bordered by 13 routes would likely be less than Alternative 3 because corrective actions would be implemented to bring those 13 routes into compliance with S&G 100 and these routes would be closed to public motorized vehicle use. The research has generally shown that a decrease in the amount of vehicle use on native surface roads and trails leads to a decrease in sediment production and changes in runoff from those roads and trails – this research was documented in the 2008 TM FEIS. The 13 routes are: 16E26 (09N82), 19E01 (09N83), 09N95, 10N01, 17E73 (10N13), 16E27 (10N21), 10N98, 16E33 (11N23F), 14N39, 17E16, 17E19, 17E24, and 17E28.

Adverse effects to features that do not include meadows would be corrected on seven routes. The reasons for corrective actions on these seven routes are described in the project record. The seven routes are: 08N23B, 12NY15, 08N35, 10N32, 10NY06, 09N04, and 10N03.

## Alternative 5

The effects of Alternative 5 are similar to Alternative 1 with a few differences as described below.

Adverse effects to the 38 meadows that currently do not meet S&G 100 as a result of 18 routes should cease once corrective actions to the 18 routes are implemented. However, adverse effects to the 38 meadows would likely continue for up to five years for two reasons:

- The 18 routes would be opened to public motorized vehicle use before the implementation of corrective actions to the 18 routes that would bring these routes into compliance with S&G 100. The research has generally shown that an increase in the amount of vehicle use on native surface roads and trails leads to an increase in sediment production and changes in runoff from roads and trails – this research was documented in the 2008 TM FEIS.
- Five years is the time period in which corrective actions must be implemented to the 18 routes. Routes that have not received corrective actions in that time period would then be closed to public motorized vehicle use.

Five years after the Record of Decision, the number of routes that meet S&G 100 (of the 18 routes that currently do not meet S&G 100) could range between zero and 18 routes. This is because the exact number of routes that can be brought into compliance with S&G 100 with the five year time period is not known and depends on a number of factors. The *best case* is that all 18 routes (of the 18 routes that do not currently meet S&G 100) would be brought into compliance with S&G 100, and the *worst case* is that zero routes would be brought into compliance with S&G 100.

## Minimization of damage to meadows

36 CFR § 212.55 subpart b, states:

*“In designating National Forest System trails and areas on National Forest System lands, the responsible official shall consider effects on the following with the objective of minimizing” (1) Damage to soil, watershed, vegetation, and other forest resources.”*

There are several aspects of 36 CFR § 212.55 (b) that are important to note.

- Trails are included and roads are not included.
- Meadows are not specifically mentioned, but are included in the phrase “. . . soil, watershed, vegetation, and other forest resources.”
- The Forest Service is not required to eliminate damage to soil, watershed, vegetation, and other forest resources when designating trails. However, the Forest Service is required to demonstrate that it has minimized damage to such resources when designating trails.

Fourteen of the 42 routes are trails. The trails are: 16E21 (11N26F), 16E26 (09N82), 16E27 (10N21), 16E33 (11N23F), 17E12, 17E16, 17E17, 17E19, 17E21, 17E24, 17E28, 17E73, 17E79, (10N13), and 19E01 (09N93).

There are ten trails that cross and/or border meadows that do not meet S&G 100. Those trails are: 16E21 (11N26F), 16E26 (09N82), 16E27 (10N21), 16E33 (11N23F), 17E16, 17E19, 17E24, 17E28, 17E73, and 19E01 (09N93). The number of meadows for each of the ten trails that do not meet S&G 100 is shown in Table 3.7.

There are two trails (17E79 and 17E12) that do not cross meadows and two trails (17E17 and 17E21) that cross meadows that meet S&G 100. These four trails already meet 36 CFR 212.55(b) because no damage is occurring to meadows as a result of these four trails.

Alternatives 1 and 2 would not meet the criteria of 36 CFR § 212.55 (b) with respect to minimizing damage to meadows from the ten trails listed above that do not meet S&G 100. The reason for this conclusion is that adverse impacts would likely continue to

occur to 25 meadows that are crossed and/or bordered by the ten trails because Alternative 1 (Proposed Action) and Alternative 2 (No Action) do not require actions to correct or mitigate adverse impacts to the 25 meadows caused by these ten trails that were identified during the 2011 and 2012 field surveys.

Alternatives 3 and 4 would meet 36 CFR § 212.55 (b) with respect to minimizing damage to meadows from ten trails. This is because the ten trails that do not meet S&G 100 would remain closed to public motorized vehicle use until corrective measures that will minimize adverse effects to meadows and ensure compliance with S&G 100 are implemented. Under Alternatives 3 and 4, the ten trails would not be designated for public motorized vehicle use pursuant to 36 CFR 212. 51 until corrective measures minimizing adverse impacts are implemented.

Alternative 5 would meet 36 CFR § 212.55 (b) with respect to minimizing damage to meadows from ten trails. This is because the ten trails that do not meet S&G 100 would be brought into compliance with S&G 100 within five years or would then be closed to public motorized vehicle use. Alternative 5 would require implementation of corrective actions to minimize adverse effects to meadows within five years, or the trails would be closed to the public motorized vehicle use until corrected.

Alternatives 3 and 4 would meet 36 CFR § 212.55 (b) to a greater degree than Alternative 5 with respect to minimizing damage to meadows from the ten trails. The In Alternative 3 and 4 the ten trails that do not meet S&G 100 would remain closed to public motorized vehicle use until corrective measures that minimize adverse effects to meadows are implemented, while Alternative 5 allows motorized vehicle use to continue on the ten trails for up to five years before corrective actions are implemented.

The rationale for the above determinations for each alternative with regard to meadows and trails is compared side-by-side in Table 3.6, and individual trails are addressed in Table 3.7.

**Table 3.6.** Summary of the minimization of damage to meadows by trails with regard to 36 CFR § 212.55 subpart b for each alternative.

Alternative(s)	Meets 36CFR § 212.55 (b)	Rationale for Determination	Relative Degree of Minimization of Damage to Meadows
1 and 2	No	Adverse impacts would likely continue to occur to 25 meadows that are crossed and/or bordered by 10 trails. This is because Alternative 1 and Alternative 2 do not require mitigation measures or other corrective actions to minimize adverse impacts to the 25 meadows caused by these 10 trails that were identified during the 2011 and 2012 field surveys. .	Negligible difference between Alternatives 1 and 2 because both alternatives do not require actions to minimize adverse impacts to the 25 meadows caused by the 10 trails that were identified during the 2011 and 2012 field surveys.
3 and 4	Yes	The 10 trails that do not meet Standard & Guideline 100 would remain closed to public motor vehicle use until corrective measures that will minimize adverse effects to meadows and ensure compliance with S&G 100 are implemented. The four remaining trails either do not cross meadows or do not have adverse effects to meadows. Those four trails already meet 36 CFR 212.55(b) because no damage is occurring to meadows as a result of those trails.	Alternatives 3 and 4 do more to minimize damage to meadows than Alternative 5 because all 10 trails that do not meet S&G 100 would remain closed to public motorized vehicle use until corrective measures that minimize adverse effects to meadows are implemented.
5		The 10 trails that do not meet Standard & Guideline 100 would be brought into compliance with S&G 100 within five years or would then be closed to public motor vehicle use. This alternative would require implementation of corrective actions to minimize adverse effects to meadows within five years, or else the trails would be closed to the public motor vehicle use.	Alternative 5 does not minimize damage to meadows immediately, but permits public motorized use to continue while the forest develops and implements the necessary corrective measures. If those measures necessary to minimize damage to meadows are not implemented within five years, the trails would be closed to the public. As a consequence, adverse effects to 25 meadows (crossed and/or bordered by 10 trails) could continue for up to five years.

**Table 3.7.** Summary of the minimization of damage to meadows by trails with regard to 36 CFR § 212.55 subpart b for each alternative.

	List of trails	Relative Degree of Minimization of Damage to Meadows
<b>Trails that do <u>not</u> cross or border meadows on National Forest land</b>	17E79 (09N04), 17E12.	<u>All alternatives.</u> These two trails meet CFR § 212.55 subpart b with respect to meadows because these trails do not cross or border meadows on National Forest system land.
<b>Trails that cross or border meadows that meet Standard &amp; Guideline 100.</b>	17E17, 17E21.	<u>All alternatives.</u> These two trails meet CFR § 212.55 subpart b with respect to meadows because these two trails cross or border meadows that meet S&G 100.
<b>Trails that cross or border at least one meadow that does <u>not</u> meet Standard &amp; Guideline 100.</b>	16E26 (09N82), 19E01 (09N83), 17E73 (10N13), 16E27 (10N21), 16E33 (11N23F), 16E21 (11N26F), 17E16, 17E19, 17E24, 17E28.	<p><u>Alternatives 1 and 2.</u> These 10 trails would not meet CFR § 212.55 subpart b with respect to meadows because adverse impacts would likely continue to occur to 25 meadows that are crossed and/or bordered by these trails. This is because Alternative 1 (Proposed Action) and Alternative 2 (No Action) do not require actions to minimize adverse impacts to the 25 meadows caused by these 10 trails that were identified during the 2011 and 2012 field surveys.</p> <p><u>Alternatives 3 and 4.</u> These 10 trails would meet CFR § 212.55 subpart b with respect to meadows because these trails would remain closed to public motorized vehicle use until corrective actions are implemented to these trails that ensure compliance with S&amp;G 100.<sup>1</sup> Alternatives 3 and 4 do more to minimize damage to meadows than Alternative 5 because the 10 trails that do not meet S&amp;G 100 would remain closed to public motor vehicle use until corrective measures that minimize adverse effects to meadows are implemented.</p> <p><u>Alternative 5.</u> These 10 trails would meet CFR § 212.55 subpart b with respect to meadows because these trails would be brought into compliance with S&amp;G 100 within five years or would then be closed to public motor vehicle use. However, Alternative 5 does less to minimize damage to meadows than Alternatives 3 and 4 – the reasons for this are described in Table 3.9.</p>

<sup>1</sup> The corrective actions could include one or more of the following: a) relocation of route segments away from meadows and the subsequent removal of unnecessary route segments near meadows, b) reconstruction of route segments to direct runoff (and sediment) from meadows, c) road or trail improvements in meadows that prevent the interception and diversion of surface and subsurface water, d) structures in route segments that enable vehicles to be suspended above meadows.

## Summary

There are 24 routes where there is no difference between the alternatives with regard to S&G 100. This is because 14 routes do not cross or border meadows and 10 routes cross or border meadows that meet S&G 100.

There are 18 routes – the routes that have caused at least one meadow to not meet S&G 100 - where there are differences between the alternatives with regard to S&G 100. Alternative 1 (Proposed Action) would create a *Forest Plan Amendment* that would exempt those 18 routes from S&G 100. Alternative 2 (no action) would result in zero of those 18 routes meeting S&G 100. Alternatives 3 and 4 would result in 18 of those routes meeting S&G 100. Under Alternative 5, the number of routes that meet S&G 100 after five years could range between zero and 18. The results with regard to S&G 100 are summarized in Table 3.8 and Figure 3.9. In addition, adverse impacts to 38 meadows (from the 18 routes) would be less from Alternatives 3, 4, and 5 than Alternatives 1 and 2.

Alternatives 1 and 2 would not meet the criteria of 36 CFR § 212.55 subpart b with respect to minimizing damage to meadows from trails. Alternatives 3, 4, and 5 would meet 36 CFR § 212.55 subpart b with respect to minimizing damage to meadows from trails. Alternatives 3 and 4 would meet 36 CFR § 212.55 subpart b to a greater degree than Alternative 5 with respect to minimizing damage to meadows from trails.

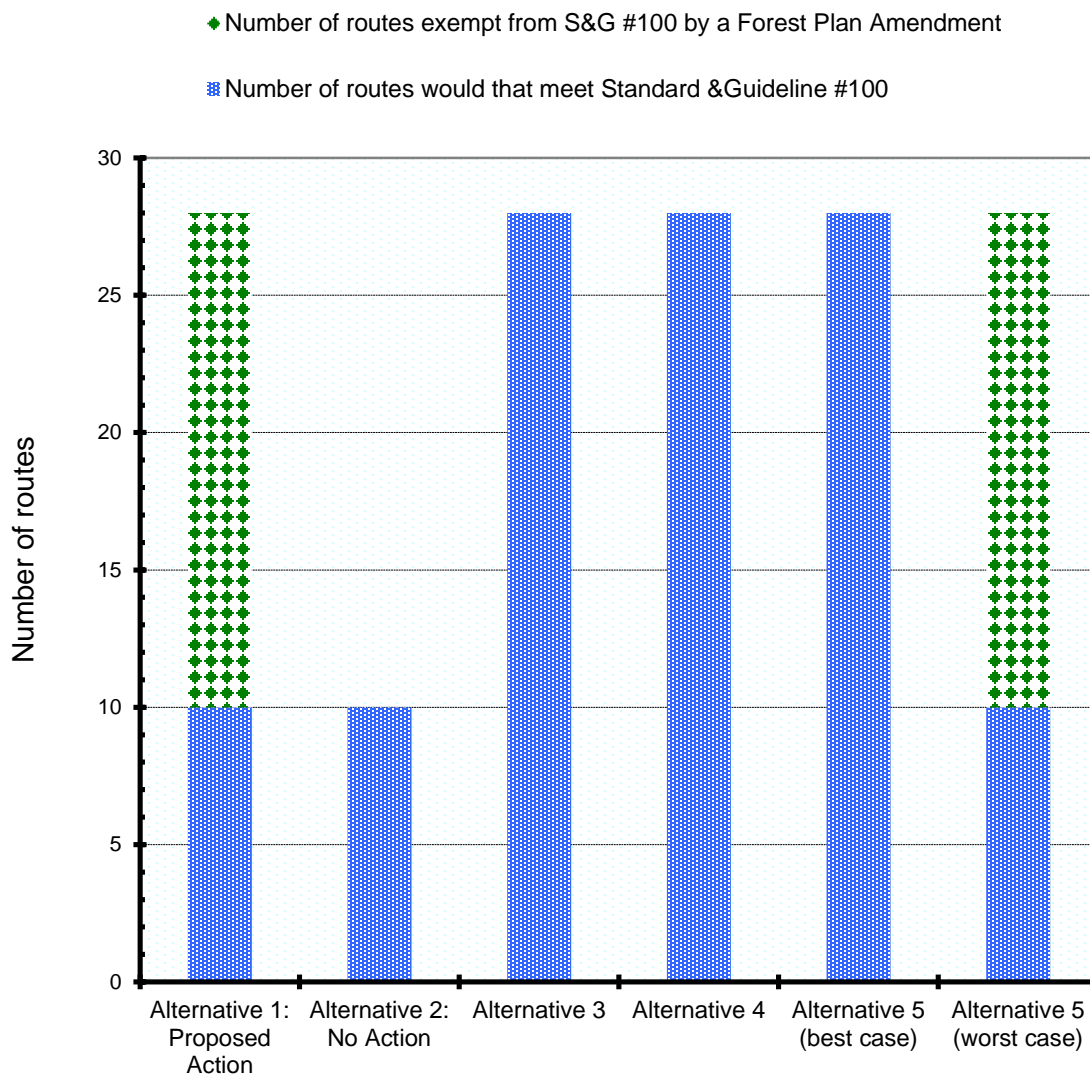
**Table 3.8** Summary of compliance of routes with regard to Standard and Guideline 100 for each alternative.<sup>1</sup>

	List of routes	Alternative 1: Proposed Action	Alternative 2: No Action	Alternative 3	Alternative 4	Alternative 5
<b>Routes that do <u>not</u> cross or border meadows.</b>	08N23B, 08N35, 17E79 (09N04), 09N54, 10N06, 10N26, 10N32, 10NY04, 11N09A, 11N22, 11N70, 12NY15, 13N24, 17E12.	S&G 100 <u>not</u> applicable for all routes because routes do not cross or border meadows.				
<b>Routes that only cross or border meadows that meet Standard &amp; Guideline 100.</b>	09N15, 10N03, 10NY05, 10NY06, 12NY06, 14N05, 14N27, 14N58, 17E17, 17E21.	S&G 100 would be met for all routes because all routes currently meet S&G 100.				
<b>Routes that cross or border at least one meadow that does <u>not</u> meet Standard &amp; Guideline 100.</b>	09N01, 09N08, 16E26 (09N82), 19E01 (09N83), 09N95, 10N01, 17E73 (10N13), 10N14, 16E27 (10N21), 10N98, 16E33 (11N23F), 16E21 (11N26F), 11NY32, 14N39, 17E16, 17E19, 17E24, 17E28.	All routes would be <u>exempt</u> from S&G 100 as a result of a <i>Forest Plan Amendment</i> .	S&G 100 would <u>not</u> be met for all routes because no corrective measures to the routes would be implemented.	S &G 100 would be met for all routes <u>after</u> corrective measures to the routes are implemented.	S &G 100 would be met for all routes <u>after</u> corrective measures to the routes are implemented.	Five years after the Record of Decision, S&G 100 would be met for between 0 and 18 routes. <sup>2</sup> All routes would be <u>exempt</u> from S&G 100 as a result of a <i>Forest Plan Amendment</i> .

<sup>1</sup> Standard and Guideline 100 of the Sierra Nevada Forest Plan Amendment Record of Decision (SNFAROD 2004): “Maintain and restore the hydrologic connectivity of streams, meadows, wetlands, and other special aquatic features by identifying roads and trails that intercept, divert, or disrupt natural surface and subsurface water flow paths. Implement corrective actions where necessary to restore connectivity.”

<sup>2</sup> For Alternative 5, the exact number of routes that can be brought into compliance with S&G 100 with the five year time period is not known and depends on a number of factors. The *best case* is that all 18 routes (of the 18 routes that do not currently meet S&G 100) would be brought into compliance with S&G 100, and the *worst case* is that zero routes would be brought into compliance with S&G 100.

**Figure 3.9** Number of routes that would meet Standard & Guideline 100 for each alternative.<sup>1,2,3</sup>



<sup>1</sup> For all alternatives, does not include the 14 routes where S&G 100 does not apply (because these routes do not cross or border meadows) and does include the 10 routes that currently meet S&G 100.

<sup>2</sup> For Alternative 1 (Proposed Action), the 18 routes that would be exempt from S&G 100 as a result of a *Forest Plan Amendment* are the 18 routes that currently do not meet S&G 100.

<sup>3</sup> For Alternative 5, the exact number of routes that can be brought into compliance with S&G #100 within the five year time period is not known and depends on a number of factors. The *best case* is that all 18 routes (of the 18 routes that do not currently meet S&G 100) would be brought into compliance with S&G 100, and the *worst case* is that zero routes would be brought into compliance with S&G 100.

## Riparian Conservation Objective Analysis

This SEIS replaces the portion of the Riparian Conservation Objective (RCO) Analysis in the March 2008 FEIS that pertains to meadows, S&G 100, and the 42 routes. All portions of the RCO Analysis in the March 2008 FEIS that do not pertain to meadows, S&G 100, and the 42 routes remain intact. The following specific items in the RCO Analysis in the March 2008 FEIS are replaced as described in Table 3.9.

**Table 3.9** Changes to the Riparian Conservation Objective Analysis in the March 2008 FEIS.

Item in the Riparian Conservation Objective (RCO) Analysis of the March 2008 FEIS	Description of replacement in the 2013 SEIS
Riparian Conservation Objective (RCO) #2, pages 3 and 4.	<ul style="list-style-type: none"> <li>• The criteria for evaluating each alternative of this SEIS is described in the <i>Affected Environment, Analysis Framework</i>.</li> <li>• The definitions and methodology for evaluating Standard &amp; Guideline 100 is described in the <i>Affected Environment, Table 3.3</i>.</li> </ul>
Table 2 (Analysis of Riparian Conservation Objectives for each alternative), RCO #2, Alternatives E and Modified B, page 7.	The effects of each alternative of this SEIS with regard to Standard & Guideline 100 are described in <i>Environmental Consequences</i> .
Table 2 (Analysis of Riparian Conservation Objectives for each alternative), RCO #5, Alternatives E and Modified B, page 9.	
Table 7 (Analysis of system routes through meadows for Alternatives E and Modified B), pages 28-39.	<ul style="list-style-type: none"> <li>• The number of meadows crossed and/or bordered by each route is in the <i>Affected Environment, Table 3.1</i>.</li> <li>• A summary of the results of the field surveys of the 42 routes is the <i>Affected Environment</i> in <i>Tables 3.2, 3.4, and 3.5</i>.</li> </ul>

## Public Motor Vehicle Use

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### Affected Environment

#### *Background*

The 42 routes being considered in this document are located on three Ranger Districts of the Eldorado National Forest. Most of the routes are located in the higher elevations, over 6,000 feet. High elevation roads and trails offer a different recreation experience than lower elevation trails. There are not a large number of high elevation 4WD recreation opportunities across the Forest. High elevation trails provide access to remote areas on the Forest, especially for older and less able individuals who might otherwise not be able to enjoy these areas. High elevation trails have cooler temperatures during the summer months than those in the lower elevations, and often have sweeping views and beautiful fall colors. The setting for these routes is more desirable for camping due to greater solitude and scenic quality. Campfires may be allowed at higher elevations when they are prohibited at lower elevations due to wildfire hazards. Some of the routes are also used by hikers, mountain bikers and equestrians. Some provide vehicle access to other hiking and equestrian opportunities, including day hikes into the Desolation and Mokelumne Wilderness areas. The higher elevation routes also offer access for deer and quail hunting during hunting season, and access for fishing along streams and lake shores. The routes also provide access for photography, geocaching, bird watching and wildlife viewing, and spiritual pursuits.

The 42 routes being considered offer a variety of levels of challenge for recreation users. Some of the routes are fully developed Forest roads, while others are passable only with specialized vehicles. Several of the routes, such as the Barrett 4WD Trail, Squaw Ridge 4WD Trail, Strawberry 4WD Trail, and Clover Valley 4WD Trail offer multi-day recreation opportunities with camping. The Barrett 4WD Trail offers a level of challenge for 4WD users that is relatively unique in the Region, allowing users to test their technical skills in travelling over large boulders. Only a few other 4WD trails in the Sierra Nevada offer a similar level of challenge, including the Rubicon Trail on the Eldorado National Forest and Fordyce Creek Trail on the Tahoe National Forest.

A number of the 42 routes being considered have been in use for over a hundred years, being remnants of early emigrant trails over the Sierra Nevada. Others have been in place for multiple generations, and many users have established treasured family traditions of bringing the younger and older generations along on trips. Exposing family and friends to the Forest through OHV recreation also fosters a love of the Forest in younger generations and provides interpretive opportunities.

## ***PUBLIC MOTOR VEHICLE USE OF THE 42 ROUTES:***

### ***Placerville Ranger District***

#### **Leek Springs Valley (09N15)**

Route 09N15 is a native surface road approximately 0.5 miles long that ends at the northeast corner of private property in the Leek Spring Valley area. This road is popular for high elevation scenic driving, for hunting, and provides access to the North Fork Cosumnes River for fishing.

#### **Leoni (09N54)**

Route 09N54 is a native surface road that enters the SW corner of the Leoni Meadows Private Camp. The road does not provide the main access into camp, but serves as a route for scenic driving and hiking. This road is open to all vehicles and is used by Forest visitors for access to the Forest, driving for pleasure, fuel wood gathering, hunting, and as a route for horseback and mountain bike riding by camp attendees.

#### **Pebble Ridge (10N06)**

Route 10N06 is a native surface road that connects two paved roads 10N59 and 10N58 in the Pebble Canyon area which is popular for scenic driving, dispersed camping and for hunters. The road is approximately 2 miles long and parallels a tributary of Camp Creek which is popular for fishing.

#### **Strawberry 4WD Trail (portion of 10N13, now 17E73)**

The northern portion of route 10N13 (17E73), also known as Strawberry 4WD trail, is used primarily by 4WD enthusiasts seeking a lower level of difficulty 4WD recreational experience. Forest visitors can access the Strawberry 4WD Trail from either the Placerville Ranger District (RD) side or the Amador RD side (via 10N13 Schneider Camp Road). The trail offers ample recreational activities such as hiking, photography, bird watching, mountain biking and wildflower viewing. The Strawberry 4WD Trail continues to be a destination for 4 wheel drive activities, especially in the late spring and early summer; however, it is not as intensively used as other trails such as the Rubicon Trail. Routes 10N13 and 17E73 combined are approximately 6.73 miles long. Except for a limited amount of the total length of the trail, the trail does not provide “extreme” 4WD conditions. The Gold Hill Posse (GHP) 4WD club has “adopted” the Strawberry 4WD Trail since 2002. This volunteer group routinely provides trail maintenance including re-enforcing water bars to redirect water from the trail. The GHP have contributed approximately 500 hours of volunteer labor since 2002, and are still active participants in the Adopt-A-Trail program.

**Mule Canyon (10N14)**

Road 10N14 provides motor vehicle access to the Cody Meadows area which is a hub for hiking, hunting, OHV use, camping, wildflower viewing and many other recreational activities. Mule Canyon provides access to some of the highest elevations on the Placerville Ranger District (7000' and above elev.); the route also has spectacular views of the surrounding areas, including Desolation and Mokelumne Wilderness Areas.

**Long Canyon 4WD Trail (10N21, now 16E27)**

Route 10N21 (16E27), also known as the Long Canyon 4WD trail, is used by 4WD vehicle operators who favor a lower level of difficulty 4WD motorized recreational experience. The Long Canyon 4WD Trail provides a 'loop' with several other routes and continues to be a destination for 4WD activities; however, it is not as intensively used as other trails such as the Rubicon Trail. The Long Canyon 4WD Trail is approximately 4 miles long and is also used for hiking, mountain biking and hunting. A segment of the trail provides a panoramic view of the forest and is a popular destination for forest recreation, both motorized and non-motorized. Except for a limited amount of the total length of the trail, the trail does not provide "extreme" 4WD conditions. Forest visitors can access the Long Canyon 4WD Trail from either the Silver Fork Road or the Packsaddle Road. The NorCal FJ Cruisers "adopted" the Long Canyon 4WD Trail in 2011. This volunteer group provides trail maintenance including the removal of trash from the trail and adjacent lands. In addition they provide peer to peer informational services to other OHV users on the trail regarding proper use of the forest and resource protection. They contributed approximately 100 hours of volunteer labor during the summer of 2011 and are still active.

**Sciots Creek (10N26)**

This route provides motor vehicle access to the Placerville Ranger District's Cody Lake, which is used by recreationists year round. The route is easily accessed off the paved Packsaddle Road. The road is used annually by the Boy Scouts of America to access 'Camp Cody' where they have had a Special Use Permit for the camp for over 60 years. Additionally, this route provides access to the Cody Meadows area which is a hub for hiking, fishing, hunting, camping, OHV use, snowshoeing, cross country skiing and many other recreational activities.

**South Beanville Creek (10N32)**

The 10N32 is a native surface road that is adjacent to the Alder Ridge Lookout in the Beanville Creek area which is popular for scenic driving and hunting.

**Jim Quinn Spur (10N98)**

Route 10N98 is a native surface road that leaves the north side of the popular paved Mormon Emigrant Trail Road along Iron Mountain Ridge adjacent to a large rock conglomerate known as “Brown Rock”. The road provides a nice vista along the ridge for approximately 1.5 miles long before it dead-ends. This road is popular for scenic driving and for dispersed camping.

**Upper Long Canyon (10NY06), Rocky Road (10NY05) and Middle Long Canyon (10NY04)**

Route 10NY06, 05 and 04 roads provide motor vehicle access to the Cody Meadows area which is a hub for hiking, hunting, camping and many other recreational activities. These routes provide access to some of the higher elevations on the district with spectacular panoramic views of the surrounding areas, including Desolation and Mokelumne wildernesses. These roads provide additional ‘loops’ surrounding the Long Canyon 4WD Trail.

**Bryan Creek (11N09A) and Sayles Canyon Trailhead**

The end of the 11N90A road is a well-developed trail head that is used for accessing Sayles Canyon Trail and the Pacific Crest National Scenic Trail. Sayles Canyon trail is a popular high elevation non-motorized trail offering many hiking, equestrian and some mountain bike activities. The high elevation environment and meadows along the hiking trail, also affords forest visitors many nature based recreational activities including wildflower walks, bird watching and photography. The relative ease of the trail provides a near wilderness experience for forest visitors who otherwise may not be able to enjoy such areas. The Bryan Creek Road is also used as a permitted access road for Sierra-at-Tahoe Ski Resort’s West Bowl area to maintain and service the ski lifts in the summer. In 2011 volunteers successfully completed the ‘Sayles Canyon Trailhead Improvement Project’ including repair and resurfacing the existing trailhead loop, cleared the roadside of overgrown brush, delineated and graded parking areas within the existing trailhead area. The volunteer group “Elegant Ears Equestrians” and other equestrian groups contributed approximately 941 hours of volunteer labor and over \$7,000 dollars in donations for materials and equipment use to improve the trailhead.

**Strawberry Creek (11N22)**

Route 11N22 provides motor vehicle access to the Strawberry Creek area which is popular for hiking, hunting, wildflower viewing and camping. The trail provides access to some of the higher elevations on the Placerville Ranger District along Strawberry Creek.

**North Shanty Spur (11N23F, now 16E33)**

The North Shanty Spur Trail provides motor vehicle access to the Bark Shanty area which is popular for hiking, hunting, 4WD travel and camping. The trail provides access to some of the higher ground on the Placerville Ranger District along the paved Packsaddle Road.

**47 Milestone (11NY32)**

The route is the only access into the Aspen Creek Summer Home Tract. This short piece of road begins at Highway 50, just west of Phillips. The route accesses several summer home cabins before it ends at private property.

**Lover's Leap Motorcycle Trail (17E12)**

Route 17E12 is a relatively short and low challenge route that provides access for motorcycles to the top of Lover's Leap with an exceptional view of the Strawberry area and Highway 50 corridor. The trail is also very popular for hiking to the top of Laver's Leap with panoramic views of the Highway 50 corridor and Desolation Wilderness peaks. The trail is heavily used by rock climbers to access both the east and west climbing walls.

**Bucks Pasture Motorcycle Trail (17E17)**

This trail connects the Cody Meadow area and the Strawberry 4WD Trail. The trail is open to motorcycle, mountain bike and equestrian use as well as hiking. This challenging single track trail provides a remote forested route with an elevation gain from 7000 feet to 8500 feet and nice views. It is popular in the summer and fall for hiking to Buck's Pasture meadow and for wildflower and wildlife viewing, and in the winter and spring for snowshoeing, snowmobiling and cross country skiing.

*Amador Ranger District***Squaw Ridge Trail (9N82, now 16E26)**

This trail system begins approximately 1 mile northeast of Onion Valley and runs into the Historic Carson Emigrant Trail along the ridge. The trail is very popular with 4WD vehicles, All Terrain Vehicle's (ATV's) and motorcycles. Portions of this trail are challenging as there are sections that are very rocky, steep and narrow. Horseback riding, biking and hiking are also popular on portions of the trail system. Much of this trail is the northern boundary of the Mokelumne Wilderness. The Squaw Ridge Trail has a wilderness trailhead for the non-motorized trail leading to Munson Meadow. Since most of this trail is on top of a ridge and high elevation, the views are spectacular. Access to this trail is via Bear River Reservoir or Tragedy Springs at Highway 88, following the Carson Emigrant National Recreation Trail (Mud Lake Trail).

**Carson Emigrant National Recreation Trail (Mud Lake Trail) (17E24 & 17E79, previously 09N04)**

This trail begins near Tragedy Springs. It takes off south of Highway 88 and ties in with the Squaw Ridge Trail where it turns north and serves as an extension of the Squaw Ridge Trail. This route, like the Squaw Ridge Trail, is popular with 4WD's, ATV's and motorcycles. The route is challenging, and is not recommended for regular 2-wheel drive vehicles. It provides a link for motorcycle users between Allen's Camp Trail 17E19 and Horse Canyon Trail (17E21). This route accesses Mud Lake, a popular dispersed camping area, and 2 wilderness trailheads, Beebe Lake and Horse Canyon. It has grand views in all directions, including Silver Lake and Pyramid Peak to the north, and Mokelumne Wilderness and Mokelumne peak to the south. Popular hikes accessed from the trail include Beebe Lakes, Melissa Coray Peak, and down Horse Canyon to the Mokelumne River.

A new staging area was recently developed at the beginning of Mud Lake Trail south of Highway 88. Off Highway Vehicles (OHV's) and equestrians will use this staging area. Trail maintenance is done by the Motherlode Rockcrawlers 4x4 Club.

**Allen's Camp Trail (17E19)**

This 4 mile long motorcycle trail begins at the Allen's Camp Trailhead just south of Plasses' Resort at Silver Lake, and intersects with 17E24, where the trail is very steep and rocky. It is a challenging route with good views.

**Horse Canyon Motorcycle Trail (17E21)**

The Horse Canyon Trail begins at the staging area approximately 0.5 mile north of Silver Lake on Highway 88. The trail ties in at to the Carson Emigrant National Recreation Trail (17E24) at the east end of Squaw Ridge. Along with motorcycle use, this trail gets a lot of equestrian, hiking and biking use. This trail intersects with the Thunder Mountain Hiking Trail and the Castle Point Trail. The upper end of the trail is braided through stands of aspen, heather and hemlock. This challenging single track route is one of the few motorcycle trails of this kind available for public use, [provides a unique experience. Some users like to travel a loop that comprised of 17E21, 17E19, 17E28 and 16E26.

**Long Valley Motorcycle Trail (17E28)**

This motorcycle trail runs a 3 mile course from Mud Lake to the west end of the Squaw Ridge Trail. The trail runs over granite and through the woods. It is a popular route for technical motorcycle riding, with beautiful creeks and ponds and places along the way to picnic. Horseback riding, biking and hiking also occur on this trail. This trail crosses Bear River, several other tributaries and skirts along Long Valley.

**Stockton Camp (9N08)**

This road accesses Stockton Municipal Organization Camp. It is mainly used by camp workers and clients. Hundreds of visitors use Stockton Municipal Camp each season.

**Clover Valley/Deer Valley Trail (9N83, now 19E01)**

The Deer Valley Trail begins just south of Lower Blue Lake and heads in a southerly direction through a 300 foot corridor through the Mokelumne Wilderness. After about 7 miles of challenging travel, it ends on Highway 4 on the Stanislaus National Forest. This trail is very popular with 4WD's, ATV's and motorcycles. The scenery is spectacular. Horseback riding, biking and hiking are also popular. This trail crosses Blue Creek and Deer Creek, where there are a scattering of popular campsites. The road follows the historic Big Tree Carson Valley Wagon Road which was used as an emigrant road since 1857. It is also the route "Snowshoe Thompson" used for many years to deliver mail. This is a connector route between Highway 88 and Highway 4.

**Twin Lake/Meadow Lake Road (9N01)**

This 2 mile section of road begins just south of Lower Blue Lake at the intersection of 9N01 and 9N83. It accesses a developed PG&E day use area at Twin Lakes and the Meadow Lake Trailhead at the end of the road. This road is open to all vehicles.

**Schnieder Camp Road (10N13)**

This road begins at the end of Alpine County Road-164 , and provides access to Schneider Cow Camp, a popular dispersed camping area for equestrians, and access to routes 17E16, 17E73, 17E17 and 17E77. This portion of road is open to all vehicles. The road connects with the Strawberry 4WD Trail, which ends near Strawberry on Highway 50.

**Little Round Top (17E16)**

This trail is currently designated for motorcycle use to the top of the ridge, where the motorized portion ends. The foot trail continues from on top of the ridge and drops down to connect with the Pacific Crest Trail. The majority of this trail is on the Placerville District. This trail is a popular fall ride for motorcycle users.

**Woods Lake Spur (10N01B)**

This portion of road, which used to be old Highway 88, begins at Alpine County Road-122 and ends on Highway 88 just west of Carson Pass. This stretch of road, open to all vehicles, has numerous dispersed campsites. Segments of the Historic Emigrant Trail follow or parallel this road.

**Devils Gate Summer Home (10N03)**

This short piece of road begins at Highway 88, east of Carson Spur and, accesses eight Forest Service permitted summer homes (recreation residences) before it dead ends at private property.

**Cosumnes Head (9N95)**

This road, from Foster Meadow Road to 9N95B is partially paved. This road is open to all vehicles and is primarily used during hunting season. It is a popular route used each summer for non-commercial permitted handcart treks.

**Prothro Headwater (8N23B)**

This road is approximately 2 miles in length, begins at Mehrten Springs Road and ends at a private property boundary. It is open to all vehicles, and is primarily used by firewood cutters and hunters.

**Upper West Panther (8N35)**

This road is between Panther Creek and Panther Ridge Road. The road is approximately 1.5 miles in length. It is used primarily by fuel wood cutters.

*Pacific Ranger District***Barrett Lake 4WD Trail (11N26F, now 16E21)**

This trail begins at the north end of Wrights Lake Recreation area and ends at Barrett Lake, a beautiful alpine lake approximately 6 miles north of the trailhead. The trail is very popular with 4WD vehicles, but has some use from ATV's, motorcycles, and bicycles. It is a favorite route of 4WD clubs and families. It is a great trail drive in and park for access to hiking opportunities to Red Peak and lake destinations in the Desolation Wilderness. Portions of this trail are quite challenging as there are sections that are very rocky, steep and narrow. The entrance is through a gate, which is designed to limit the maximum width of vehicles entering the trail. The gate is opened seasonally when the Hi-Landers (a volunteer group that has adopted the trail) complete spring maintenance and the District Ranger determines that the trail is in a condition to prevent resource damage, usually in mid-July. The trail has high use daily while it is open. The gate is closed in the fall when heavy rain or snow create conditions that could lead to resource damage.

**McManus (11N70)**

This road begins approximately 3.5 miles off the White Meadows road, and primarily runs through private property, accessing areas of Soldier Creek. It is used as access for

hunting, fuel wood cutting, dispersed camping, and target shooting. This road can be used by all vehicles.

**Crystal Shortcut (12NY06)**

This road is used primarily to access dispersed camping areas south of Union Valley Reservoir, as well as motorcycle and ATV touring. It is used by all types of vehicles.

**West Robbs Peak (12NY15)**

This road begins off the main route to Robbs Peak Lookout, and can be used by all vehicles. It is used primarily to access areas for hunting, dispersed camping, and target shooting.

**Dry Lakes (13N24)**

This is a loop road that connects Wentworth Springs Road on the northeast end to the Southfork Loop Road on the south. This road can be used by all vehicles, and is used for access to the Deer Creek Trail, leading down to the Rubicon River. Primary use is hunting, with some motorcycle and ATV activity.

**McKinstry Lake (14N05)**

This route, accessible by all vehicles, has high recreation value for camping, hiking, and OHV use. It is used daily from the time snow melts in the spring until snow closes it in the winter. It provides access to the McKinstry Trail, and is used to access many dispersed camping areas. It is approximately 5 miles long, and terminates near the Rubicon Trail, providing pedestrian access. It is also a popular area for hunting in the fall.

**Bunker Meadow (14N27)**

This road is almost seven miles to its end, and provides access by all vehicles to areas used extensively in the late summer and fall for hunting. It also is the access for hiking to Bunker Lake.

**Richardson Lake (14N39)**

This road is on the far northeastern end of the Forest, and must be accessed through roads leading from the Lake Tahoe area. It is used to access Richardson Lake for camping and fishing, and travel to the top of Sourdough Hill to enjoy the scenic vistas, including a good view back towards the Rubicon Trail. The route also provides access to the Pacific Crest Trail. A 4WD vehicle must be used to reach this road.

**Jerrett (14N58)**

This is a spur road off of the McKinstry road, passing alongside McKinstry Lake and ending on the southwest side of Jerrett Peak. It is used primarily by 4WD and OHV's, and accesses areas for dispersed camping, viewing, and fall hunting.

***Indicator Measures***

Two indicator measures were used for this analysis. The first is a relative recreation value rating that was assigned to each route based on a set of criteria explained below. The second indicator measure used was whether the route is a high country route (traverses ground over 6,000 feet in elevation). High country routes represent a unique recreation opportunity in the Sierra Nevada, and many of the historic high country routes have been closed to public motorized use in the past, so few routes of this type remain available for public motorized recreation use.

***Rating of Values Associated with the 42 Routes***

For the purpose of this analysis, the following criteria have been used to provide a rating of recreation access and opportunities for public motor vehicle use of the 42 routes. The criteria are similar to those that were used in the 2008 Travel Management FEIS, Appendix H, to rate recreation values associated with Intermittent Service Roads (NFS Level 1 Roads).

***Low***

- Routes which provide only a very limited recreation opportunity, such as a short route which accesses no specific dispersed recreation opportunity; or
- Routes which provide access to a recreation opportunity that is very common, such as access for hunting in an area with many other routes of comparable opportunity; or
- Routes which have a low level of use because of the lack of public recreation opportunities.

***Medium***

- Routes which provide only a moderate level of recreation opportunity, such as an access route to a moderately popular dispersed recreation opportunity; or
- Routes which provide access to a recreation opportunity that is somewhat unique, such as access to stream reaches popular for fishing in an area lacking many other comparable opportunities; or
- Routes which provide recreation opportunities along the road which are not motor vehicle based, such as horseback riding, etc.

- Routes which have a moderate level of use because of the presence of public recreation opportunities or proximity to population centers; or
- Routes which provide a diversity of public recreation opportunities, such as dispersed camping, fishing, swimming, etc., and/or a diversity of opportunities for public wheeled motor vehicles, such as 4WD, ATV, motorcycle, etc.

**High**

- Routes which provide a high level of recreation opportunity, based on either a diversity of recreation opportunities or a single opportunity which is very popular. This may include access routes to popular dispersed recreation opportunities or several high quality recreation opportunities which are not common within the general area; or
- Routes which access Forest developed recreation opportunities, such as staging areas, trailheads, etc.; or
- Routes which provide access to a recreation opportunity that is somewhat unique, such as access to a popular swimming hole or cascade/waterfall in an area lacking many other comparable opportunities, or
- Routes which have a moderate to high level of use because of the presence of public recreation opportunities or proximity to population centers; or
- Routes which provide a high level of diversity of public recreation opportunities, such as dispersed camping, fishing, swimming, etc. and/or a diversity of opportunities for public wheeled motor vehicles, such as 4WD, ATV, motorcycle, etc.; or
- Routes which create loops or connect with other routes to provide recreation opportunities; or
- Routes which serve a role within popular riding or travel areas, such as roads to staging areas.

**Table 3.10 Rating of Values for the 42 Routes**

<i>Number</i>	<i>Name</i>	<i>Low</i>	<i>Medium</i>	<i>High</i>	<i>High Country (Above 6000 feet elevation)</i>
<b>Routes found by USFS to not cross or border meadows on National Forest land</b>					
08N23B	Prothro Headwater		X		Y
08N35	Upper West Panther	X			N
09N54	Leoni		X		N
10N06	Pebble Ridge	X			N
10N26	Sciots Creek/Cody Lake			X	Y
10N32	South Beanville Creek		X		partially
10NY04	Middle Long Canyon			X	partially
11N09A	Bryan Creek (Sayles Canyon Trailhead)			X	Y
11N22	Strawberry Creek		X		Y
11N70	McManus		X		N
12NY15	West Robbs Peak		X		Y
13N24	Dry Lakes	X			N
17E12	Lovers Leap Trail			X	Y
17E79 (09N04)	Pardoe 4WD			X	Y
<b>Routes found by USFS to meet Standard &amp; Guideline 100</b>					
09N15	Leek Springs Valley		X		Y
10N03	Devils Gate	X			Y
10NY05	Rocky Road (Long Canyon)			X	Y
10NY06	Upper Long Canyon			X	Y
12NY06	Crystal Shortcut	X			N
14N05	McKinstry Lake			X	Y

14N27	Bunker Meadow		X		Y
14N58	Jerret		X		Y
17E17	Bucks Pasture			X	Y
17E21	Horse Canyon Trail			X	Y
<b>Routes found by USFS to not meet Standard &amp; Guideline 100</b>					
09N01	Blue Lakes (Twin Lake/Meadow Lake)			X	Y
09N08	Stockton Camp			X	Y
09N95	Cosumnes Headwater		X		Y
10N01B	Woods Lake Spur			X	Y
10N13	Schneider Camp/Strawberry			X	Y
10N14	Mule Canyon			X	Y
10N98	Jim Quinn Spur		X		Y
11NY32	47 Milestone			X	Y
14N39	Richardson Lake/Sourdough Hill			X	Y
16E21 (11N26F )	Barrett 4WD			X	Y
16E26 (09N82)	Squaw Ridge 4WD			X	Y
16E27 (10N21)	Long Canyon 4WD			X	Y
16E33 (11N23F )	North Shanty Spur			X	Y
17E16	Little Round Top		X		Y
17E19	Allen's Camp Trail		X		Y
17E24	Carson Emigrant National Recreation Trail			X	Y
17E28	Long Valley Trail			X	Y
17E73 (10N13)	Schnieder Camp/Strawberry 4WD			X	Y
19E01 (09N83)	Clover Valley/Deer Valley			X	Y

## **Direct Effects to Public Motor Vehicle Use**

### **Effects of Alternative 1 (Proposed Action)**

In Alternative 1, all of the routes temporarily closed under the court order in 2012 would be reopened for public motorized use according to the type of use established in the 2008 Eldorado National Forest Travel Management Environmental Impact Statement and Record of Decision. For the 42 routes, approximately 95.8 miles of roads and trails rated high in recreation value would be open to public motorized use. Approximately 42.1 miles of 4WD routes, all rated high in recreation value, would be open. Approximately 18.5 miles of high country motorcycle routes would be open, all rated medium to high in recreation value. Users would be able to continue enjoying these traditional motorized routes and the portions of the Forest they access. None of the 42 routes rated medium or high recreation value would be closed to public motorized use. A summary of the miles of routes that would be reopened is provided in Table 3.11.

### **Effects of Alternative 2 (No Action)**

In Alternative 2, all portions of the 42 routes that are currently closed would remain closed to public motorized use. The 30 miles of high value recreation routes that were not closed by court order would remain open, with 65.9 miles of high value recreation routes closed to public motorized use. Approximately 11.2 miles of high country 4WD trails would remain open, all rated high in recreation value, and 30.8 miles of high country 4WD trails would remain closed, all rated high in recreation value. This represents 65 percent of the total 4WD trail opportunities on the Eldorado National Forest over 6,000 feet in elevation. All of the high country motorcycle trails, approximately 18.5 miles, rated medium to high recreation value, would be closed to public motorized use. This represents 90 percent of the total motorcycle trail opportunities on the Eldorado National Forest over 6,000 feet in elevation. Routes that are closed to public motorized use may remain open to non-motorized trail uses, resulting in an increase in the non-motorized trail opportunities on the Eldorado National Forest. A summary of the miles of routes that would be open and closed is provided in Table 3.11.

### **Effects of Alternative 3 (Preferred Alternative)**

In Alternative 3, approximately 53.4 miles of high value recreation routes would be open to public motorized use, with an additional 42.4 miles of high value recreation routes would be continue to be part of the NFTS but would not be designated for public motorized use and identified on a MVUM until the routes are in compliance with S&G 100 as it pertains to meadows. Approximately 11.2 miles of high country 4WD trails would remain open, all rated high in recreation value, and an additional 30.8 miles of high country 4WD trails routes would be continue to be part of the NFTS but would not be designated for public motorized use and identified on a MVUM until the routes are in

compliance with S&G 100 as it pertains to meadows. All of the high country motorcycle trails, approximately 18.5 miles, rated medium to high recreation value, would be routes would be continue to be part of the NFTS but would not be designated for public motorized use and identified on a MVUM until the routes are in compliance with S&G 100 as it pertains to meadows. None of the medium or high value recreation routes are designated closed to public motorized use. It is estimated that analyzing and implementing necessary mitigation measures designed to meet S&G 100 could take a number of years, depending upon available funding sources. A summary of the miles of routes that would be open and closed is provided in Table 3.11.

#### **Effects of Alternative 4**

In Alternative 4, approximately 35.7 miles of high value recreation routes would be open to public motorized use, with an additional 13.4 miles of high value recreation routes would be continue to be part of the NFTS but would not be designated for public motorized use and identified on a MVUM until corrective actions or mitigation are analyzed and implemented, and 46.7 miles of high value recreation routes closed to public motorized use. Approximately 9 miles of high country 4WD trails would remain open, all rated high in recreation value, and an additional 7.9 miles of high country 4WD trails would be continue to be part of the NFTS but would not be designated for public motorized use and identified on a MVUM until corrective actions or mitigation are analyzed and implemented. Approximately 25.3 miles of high country 4WD trails would be closed, all rated high in recreation value. This includes many very popular routes such as the Strawberry 4WD Trail, Squaw Ridge 4WD Trail, Carson Emigrant National Recreation Trail, and Clover Valley/Deer Valley Trail. Approximately 53 percent of the total 4WD trail opportunities on the Eldorado National Forest over 6,000 feet in elevation would be closed. All of the high country motorcycle trails, approximately 18.5 miles rated medium to high recreation value and representing 90 percent of the total motorcycle trail opportunities on the Eldorado National Forest over 6,000 feet in elevation, would be closed to public motorized use. This represents 90 percent of the total motorcycle trail opportunities on the Eldorado National Forest over 6,000 feet in elevation. Routes that are closed to public motorized use may remain open to non-motorized trail uses, resulting in an increase in the non-motorized trail opportunities on the Eldorado National Forest. It is estimated that analyzing and implementing necessary mitigation measures designed to meet S&G 100 could take a number of years, depending upon available funding sources. A summary of the miles of routes that would be open and closed is provided in Table 3.11.

**Effects of Alternative 5**

Effects to public motorized use would be similar to those described under Alternative #1 for the first five years. At that point, if corrective actions have not been analyzed and implemented on all of the 18 routes that did not meet S&G 100, some of the routes could be closed until those corrective actions are analyzed and implemented.

**Table 3.11 Direct Effects to Public Motor Vehicle Use by Alternative**

	<b>Alternative 1 Proposed Action</b>	<b>Alternative 2 No Action</b>	<b>Alternative 3 Preferred Alternative</b>	<b>Alternative 4</b>	<b>Alternative 5</b>
Miles of High Recreation Value Routes open to public motorized use	95.8	30.0	55.2	35.7	95.8
Miles of High Recreation Value Routes open to public motorized use after mitigation	0	0	40.6	13.4	0
Miles of High Recreation Value Routes closed	0	65.9	0	46.7	0
Miles of High Country (all high recreation value) 4WD Trail open	42.1	11.2	11.2	9.0	42.1
Miles of High Country (all high recreation value) 4WD Trail open after mitigation	0	0	30.8	7.9	0
Miles of High Country (all high recreation value) 4WD trail closed	0	30.8	0	25.3	0
Percentage of total High Country 4WD trail on Eldorado NF closed	0	65%	0	53%	0
Miles of High Country (all medium to high recreation value) Motorcycle Trail open	18.5	0	0	0	18.5
Miles of High Country (all medium to high recreation value) Motorcycle Trail Open after mitigation	0	0	18.5	0	0
Miles of High Country (all medium to high recreation value) Motorcycle Trail closed	0	18.5	0	18.5	0
Percentage of total High Country Motorcycle Trail on Eldorado NF closed	0	90%	0	90%	0

## Indirect Effects to Public Motor Vehicle Use

In addition to the direct affects to recreation under each alternative, there are some additional routes that would be indirectly affected under each alternative other than the proposed action, resulting in a decrease in mileage available for recreation. These roads and trails are routes that are accessed by one of the 42 routes planned to be closed or opened after mitigation in that alternative. These routes are currently designated open to motorized use under the 2008 Eldorado National Forest Public Wheeled Motorized Travel Management EIS and Record of Decision, but they are not currently displayed on the MVUM since they cannot be reached without travelling on a portion of one of the 42 routes currently closed to public motorized use pending completion of this SEIS. In alternatives where they are not shown closed, the routes would be added back on to the MVUM after a decision is issued on this SEIS.

In Alternative 2, No Action, 11.2 miles of additional routes would be affected. In Alternative 3, 8.1 miles would be affected until corrective actions are completed on the respective access routes. In Alternative 4, 9.3 miles would be affected until corrective actions and/or mitigation is completed on the respective access routes. No miles of additional routes would be affected in Alternative 1 or for the first five years with Alternative 5.

**Table 3.12 Indirect Effects to Public Motor Vehicle Use by Alternative**

	<b>Alt. 1 Proposed Action</b>	<b>Alt. 2 No Action</b>		<b>Alt. 3 Preferred Alternative</b>		<b>Alt. 4</b>		<b>Alt5</b>
<i>Access route (one of the 42 routes)</i>	<i>Additional Routes affected</i>	<i>Additional Routes affected</i>	<i>Miles closed</i>	<i>Addition al Routes affected</i>	<i>Miles closed until corrective actions or mitiga- tion on access route</i>	<i>Routes affected</i>	<i>Miles closed until corrective actions or mitiga- tion on access route</i>	<i>Additional Routes affected</i>
08N23B	none	none	--	none	--	none	--	none
08N35	none	none	--	none	--	none	--	none
09N54	none	none	--	none	--	none	--	none
10N06	none	none	--	none	--	none	--	none

10N26	none	10N26B 10N26C 10NY06B	0.4 0.3 0.6	none	--	none	--	none
10N32	none	none	--	none	--	none	--	none
10NY04	none	none	--	none	--	none	--	none
11N09A	none	none	--	none	--	none	--	none
11N22	none	none	--	none	--	none	--	none
11N70	none	none	--	none	--	none	--	none
12NY15	none	12NY15A 12NY15B 12NY15D	0.2 0.2 0.2	none	--	12NY15A 12NY15B 12NY15D	0.2 0.2 0.2	none
13N24	none	none	--	none	--	none	--	none
17E12	none	none	--	none	--	none	--	none
17E79 (09N04)	none	none	--	none	--	none	--	none
09N15	none	09N15A	0.3	none	--	none	--	none
10N03	none	none	--	none	--	none	--	none
10NY05	none	none	--	none	--	none	--	none
10NY06	none	10NY06B	0.6	none	--	10NY06B	0.6	none
12NY06	none	none	--	none	--	none	--	none
14N05	none	14N58A 14N58B	0.5 0.3	none	--	none		none
14N27	none	14N27F	0.2	none	--	none	--	none
14N58	none	See 14N05	See 14N05	none	--	14N58A 14N58B	0.5 0.3	none
17E17	none	none	--	none	--	none	--	none
17E21	none	none	--	none	--	none	--	none
09N01	none	none	--	none	--	none	--	none
09N08	none	none	--	none	--	none	--	none

09N95	none	none	--	none	--	none	--	none
10N01B	none	none	--	none	--	none	--	none
10N13	none	none	--	none	--	none	--	none
10N14	none	10N04 10N04A 10N04B 10N14A 10N14H 10N14HA 10N14HB 10N14B (17E74) 10N26D	2.8 0.2 1.0 0.4 0.5 0.1 <.1 1.7 .2	10N04 10N04A 10N04B 10N14A 10N14H 10N14H A 10N14HB 10N14B (17E74) 10N26D)	2.8 0.2 1.0 0.4 0.5 0.1 <.1 1.7 .2	10N04 10N04A 10N04B 10N14A 10N14H 10N14HA 10N14HB 10N14B (17E74) 10N26D)	2.8 0.2 1.0 0.4 0.5 0.1 <.1 1.7 .2	none
10N98	none	10N98B	0.4	10N98B	0.4	10N98B	0.4	none
11NY32	none	none	--	none	--	none	--	none
14N39	none	none	--	none	--	none	--	none
17E16	none	none	--	none	--	none	--	none
16E21 (11N26F)	none	none	--	none	--	none	--	none
16E26 (09N82 )	none	none	--	none	--	none	--	none
16E27 (10N21)	none	none	--	none	--	none	--	none
16E01 (09N83)	none	none	--	none	--	none	--	none
16E33 (11N23F)	none	none	--	none	--	none	--	none
17E19	none	none	--	none	--	none	--	none
17E24	none	none	--	none	--	none	--	none
17E28	none	none	--	none	--	none	--	none
17E73	none	none	--	none	--	none	--	none
19E01	none	none	--	none	--	none	--	none

(09N83)								
Total miles of routes affected	0	--	11.2	--	8.1	--	9.3	0

Another indirect effect of some alternatives is the concentration of public wheeled motor vehicle use on the remaining routes that remain open on the Eldorado and other Sierra Nevada forests. This would be most pronounced in Alternative 2, No Action, with the highest number of 4 wheel drive routes remaining closed. It would also occur to some extent with Alternatives 3 and 4. With a limited number of challenging high elevation four wheel drive trails available, the use would be expected to increase on other routes not covered in this SEIS such as the Rubicon Trail, on the Eldorado National Forest and Fordyce Trail on the Tahoe National Forest.

## Newly Proposed Threatened and Endangered Species \_\_\_\_\_

On April 25, 2013 the U.S. Fish and Wildlife Service issued a proposed rule to list the Sierra Nevada yellow-legged frog as an endangered species and the Yosemite toad as a threatened species. The Service also proposed to designate as critical habitat approximately 1,105,400 acres for the Sierra Nevada yellow-legged frog in Butte, Plumas, Lassen, Sierra, Nevada, Placer, El Dorado, Amador, Calaveras, Alpine, Mariposa, Mono, Madera, Tuolumne, Fresno, and Inyo Counties, California; and approximately 750,926 acres for the Yosemite toad in Alpine, Tuolumne, Mono, Mariposa, Madera, Fresno, and Inyo Counties, California. A number of the routes being evaluated in the FSEIS occur within the range of these species or within areas proposed as critical habitat. Information about the presence of Sierra Nevada yellow-legged frogs, Yosemite toads, or their proposed critical habitat relevant to the 42 specific routes, has therefore been added to the FSEIS.

### Affected Environment

#### *Background*

The U.S. Fish and Wildlife Service has found that the Sierra Nevada yellow-legged frog (*Rana sierrae*) is presently in danger of extinction throughout its entire range, based on the immediacy, severity, and scope of the threats to its continued existence. These threats include habitat degradation and fragmentation, predation and disease, climate change, inadequate regulatory protections, and the interaction of these various stressors impacting small remnant populations. There has been a rangewide reduction in abundance and geographic extent of surviving populations of frogs following decades of fish stocking, habitat fragmentation, and most recently a disease epidemic. Surviving populations are smaller and more isolated, and recruitment in disease-infested populations is much reduced relative to historic norms. Road and trail use by motorized vehicles and motorcycles have been known to result in direct impacts to Sierra Nevada yellow-legged frogs from habitat degradation and road kill at wet crossings (Spellerberg 1998). Past impacts to streams from road runoff have resulted in sedimentation and increased runoff causing downcutting and stream incisement. This combination of population stressors makes persistence of the species precarious throughout the currently occupied range in the Sierra Nevada.

The U.S. Fish and Wildlife Service has found that the Yosemite toad (*Anaxyrus canorus*) is likely to become threatened with extinction throughout its range within the foreseeable future, based on the immediacy, severity, and scope of the threats to its continued existence. These include habitat loss associated with degradation of meadow hydrology, most commonly due to historic livestock grazing but also due to roads, trails, or

recreation uses. Direct impacts have been documented where Yosemite toads have been crushed by vehicles while crossing travel routes during their reproductive period. Other stressors include climate change impacting small remnant populations, likely compounded with the cumulative effect of other threat factors (such as disease).

### ***Biological Requirements of the Sierra Nevada Yellow-legged Frog and Yosemite Toad***

The Sierra Nevada yellow-legged frog is highly aquatic and is found in a variety of habitats including lakes, ponds, tarns, wet meadows, and streams (Grinnell and Storer 1924, Zweifel 1955, Mullally and Cunningham 1956). Breeding occurs shortly after snowmelt (Knapp and Matthews 2000, Knapp et al. 2003). Larvae take two to three years to metamorphose and thus require permanent water to survive (Zweifel 1955, Bradford 1983). After breeding, adults may disperse into a variety of aquatic habitats for feeding, including more ephemeral sites unsuitable for overwintering or breeding (Pope and Matthews 2001). During the active season, total movement distances are typically less than a few hundred meters (Vredenburg et al. 2004; Pope and Mathews 2001; Mathews and Pope 1999), but movements of greater than 1 km between high elevation lakes following stream courses are known to occur (Pope and Mathews 2001). In general, all life stages are fairly easy to detect using visual encounter surveys (Bradford 1989, Knapp and Matthews 2000).

The Yosemite toad is endemic to high elevation (>1800 m) aquatic habitats in the central Sierra Nevada south of Carson Pass. Yosemite toads on the Eldorado NF are suspected of being a genetic cross between Yosemite toad and western toad (*Anaxyrus boreas halophilus*). Adults arrive at breeding sites and lay eggs at snowmelt commonly in shallow, warm water areas in wet meadows, ponds, slow moving streams, and flooded, grassy areas adjacent to lakes (Karlstrom 1962). Breeding generally takes place over a short period of time (may be as short as ~5 days)(Kagarise Sherman 1980, Sadinski 2004). After breeding, adults often disperse into upland habitat and retreat to burrows and other cover making them difficult to detect (Karlstrom 1962, Liang 2010). In studies at Tioga pass, Sherman and Morton (1993, 1984) found that males tended to stay in the nearby meadows when not breeding, while females dispersed farther, into large willow thickets. In general, toads do not occur more than 100 yards from permanent water (Karlstrom, 1962).

### ***Aquatic Habitat: GIS analysis, surveys and sightings***

Suitable breeding and overwintering habitat for the SNYLF is provided by perennial and intermittent water bodies and streams above 4,500 feet in elevation. Forty routes occur above 4,500 feet in elevation and review of these routes was performed by aquatic biologists in 2012 and 2013, to evaluate whether routes crossed wet streams or traveled

next to wet features that could provide breeding or overwintering habitat for SNYLF. The proximity of routes to potential habitat, the presence of wet stream crossings, and the presence of functioning culverts at wet crossings was recorded on field forms. Wet stream crossings (and other crossings with potential to deliver sediment to the stream or affect the species) were surveyed 100 meters upstream and downstream from the route for presence of any tadpoles or adult Sierra Nevada yellow-legged frogs. (Surveys were not conducted where the stream crossings had culverts and did not have potential to affect SNYLF habitat through sediment delivery or other effects to aquatic habitat). More detailed descriptions of the surveys and survey results are provided in the Biological Assessment prepared for this project. Sierra Nevada yellow-legged frogs were found to be present on routes 17E24 (east portion) and 17E28, and absent at stream crossings along the other surveyed routes, based on these visual encounter surveys.

Suitable habitat for the Yosemite toad on the Eldorado NF is provided by high elevation wetland areas, meadows, ponds and slow moving streams, above 6,400 feet in elevation, and south of Carson Pass. Seven routes occur above 6,400 feet in elevation and within the range of the Yosemite toad. Field surveys for meadows performed by USFS hydrology crew in 2011 and 2012, and field reviews performed by aquatic biologists in 2012 and 2013 found that all seven of these routes crossed aquatic features or traveled next to wet features that could provide habitat for Yosemite toads. Yosemite toads are known to occur in habitat traversed by two of these routes: 09N01 and 19E01. These two routes also occur within proposed critical habitat for this species. Detailed descriptions of surveys and results are provided in the Biological Assessment prepared for this project.

## **Effects on Newly Proposed Threatened and Endangered Species**

### ***Background***

In its April 25, 2013 proposal to list the Sierra Nevada yellow-legged frog as endangered and to list the Yosemite toad threatened, and its proposal to designate critical habitat for both species, the U.S. Fish and Wildlife Service reports a number of potential effects from motorized road and trail use. The following is a summary of these findings:

Roads create the potential for direct mortality of Sierra Nevada yellow-legged frogs through vehicle strikes and the possible introduction of contaminants into new areas; since most extant populations are not located near roads, collectively, direct mortality risks to Sierra Nevada yellow-legged frogs are likely of sporadic significance. Nonetheless, U.S. Fish and Wildlife Service finds that such impacts may be important incidentally on a site specific basis.

Use of vehicles, including off highway vehicles, may threaten all life stages of the Sierra Nevada yellow-legged frog through degradation of aquatic and riparian habitat. Off-highway motor vehicle trail use can compact soils within riparian habitat, create excessive road runoff, resulting in a lower the water table, loss of riparian or wet meadow vegetation and increased sediment delivery to streams. High elevation areas, where much of the increased recreational activity occurs, are naturally stressed ecosystems because of intense solar exposure; extremes in temperatures, precipitation levels, and wind; short growing seasons; and shallow, nutrient poor soil. Such habitats are typically not resilient to disturbance. Greater public access from motorized roads and trails can increase recreational activity in riparian areas and at fragile lakeshores, resulting in trampled vegetation, compacted soils, and physical damage to streambanks. Studies have not been conducted to determine the extent to which road and trail use and recreational activities are directly contributing to the decline of the Sierra Nevada yellow-legged frog. Currently, the U.S. Fish and Wildlife Service considers recreational activities (including off-highway vehicle road and trail use) to be a threat of lower significance to Sierra Nevada yellow-legged frog habitat overall, when compared to other stressors (USDI 2013b).

Road use may impact Yosemite toad habitat through soil compaction or erosion and vegetation displacement, leading to increased rates of siltation and drying of wet meadows, contributing to the loss of breeding habitats for the Yosemite toad. The best available information does not indicate whether ongoing road use and maintenance are significant threats to the Yosemite toad. Where foot traffic or vehicle activity adjacent to occupied meadows is more prevalent, erosion and channel incision could result. The U.S. Fish and Wildlife Service found that collectively, direct mortality from land uses within the Yosemite toad range may have a population-level impact.

### ***Critical Habitat***

Critical habitat has been proposed by the US Fish and Wildlife Service (USDI 2013a) to encompass large landscape areas which include current and past occurrences of SNYLF or Yosemite toads. Critical habitat exists at a location if the primary constituent elements for critical habitat occur, whether or not the species is present or absent at the location (USDI 2013a). According to USDI (2013), the following actions and uses could adversely modify critical habitat for the SNYLF or the Yosemite toad:

(1) *Actions that significantly alter water chemistry or temperature.*

Water chemistry can be affected by pollution from petroleum spills at the natural crossings: Vehicles and motorcycles have the potential to leak or spill petroleum at the stream crossings (without bridges), particularly on perennial crossings. If oil products were to enter the river, they could affect aquatic life downstream.

(2) Actions that would significantly increase sediment deposition within the stream channel, lake, or other aquatic feature, or disturb riparian foraging and dispersal habitat.

Runoff from trail surfaces can be a source of sedimentation and stream turbidity that can affect stream habitat where SNYLF or Yosemite toads reside. Regular use of motorized trails can degrade stream banks at raw crossings, result in loss of plant cover, or cause an increase in bare ground, soil compaction, and erosion. Changes in substrate morphology can influence in-stream primary production and macroinvertebrate assemblages.

Additionally, fine-grained sediment may envelop eggmasses, affecting herpetofauna reproduction. Routes that cause erosional features at stream courses may affect all life stages within the vicinity of that travel route.

(3) Actions that would significantly alter channel or lake morphology, geometry, or water availability.

Ruts and gullies in trails capture runoff and sediment and deliver concentrated flow to a streamcourse, sometimes resulting in downcutting and alteration of channel morphology, and affecting the SNYLF or Yosemite toad. These changes can result in alteration of wet meadow or pond morphology, geometry, or inundation period degrading or eliminating Yosemite toad habitat.

(4) Actions that significantly reduce or limit the availability of breeding or overwintering aquatic habitat for the Sierra Nevada yellow-legged frog or Yosemite toad.

SNYLFs are affected by disturbance to aquatic or riparian terrestrial habitats. They exhibit high habitat specificity, remaining in the same location year after year (USDA Forest Service 2001). Disturbance of riparian foraging or upland dispersal habitat can cause an increase in sediment deposition resulting from road or trail use in wet meadow systems used by Yosemite toads or can disturb upland foraging and dispersal habitat for this species. The disturbance or reduction of pools and shallow wetted areas within the meadow or stream habitat may impact Yosemite toad breeding habitat.

## *Direct and Indirect Effects of the Alternatives*

### **Effects of Alternative 1- Proposed Action**

#### Sierra Nevada Yellow-legged Frog

Routes that occurred above 4,500 feet in elevation and traveled next to wet features and/or had wet stream crossings without functioning culverts, were considered to have potential to influence streams or water bodies that may provide habitat for Sierra Nevada yellow-legged frogs. Fourteen of the routes that would be immediately opened for public motorized use in Alternative 1, had the potential to influence streams or water bodies which may provide habitat for the Sierra Nevada yellow-legged frog (Table 3.1). Sierra Nevada yellow-legged frogs have been observed at stream habitat crossed by the following two routes: 17E24 east and 17E28, both along the Bear River drainage. Opening these two routes to motorized use could result in effects to frogs from increased turbidity and sediment delivery to the stream, or the possibility of Sierra Nevada yellow-legged frogs being crushed by vehicles crossing at these locations. A survey for Sierra Nevada yellow-legged frogs has not been completed on Route 16E26 (09N82), so presence of SNYLF along this route remains unknown. As described in the Hydrology section and shown in Table 3.2, these routes do not meet Standard and Guidelines #100, and are therefore likely be contributing to indirect effects from erosional features affecting meadows and associated aquatic habitat.

Visual encounter surveys indicate that frogs are absent in proximity to crossings along the remaining 11 routes. Increases in stream turbidity, sediment deposition, or disturbance to riparian vegetation may occur at raw stream crossings associated with motorized use along these routes, but would be unlikely to affect currently occupied sites.

#### *Proposed Critical Habitat:*

Ten of the routes that would be designated immediately open for public motor vehicle use in Alternative 1 occur (wholly or partially) within proposed critical habitat and could affect the quality of SNYLF habitat (Table 3.2). Motor vehicle use on the 10 routes shown in Table 3.2 that have mileage in proposed critical habitat and do not meet Standard and Guideline #100, could adversely modify elements of critical habitat by contributing to indirect effects from erosional features affecting meadows and associated aquatic habitat. Routes 9N01, 9N08, 14N05, 14N39, 14N58, 16E21, 17E17, and 17E24 (west portion), also occur in proposed critical habitat and would be immediately opened for public motor vehicle use in Alternative 1. These routes were found unlikely to influence SNYLF habitat because the routes were not located next to wet features and all wet stream crossings had functioning culverts.

**Table 3.13.** Routes with potential to influence SNYLF habitat along portions opened for motor vehicle use in Alternative 1.

Route Number	Does not meet S&G #100	Route Miles in Proposed Critical Habitat	Species Present (P) or Absent (A) <sup>2</sup>
10N01B (10N01)	X	0.19 (east) 0.63 (west)	A
10N13	X	0.48	A
10N26		0	A
14N27		0	A
16E26 (09N82)	X	6.97	Unsurveyed
16E27 (10N21)	X	0	A
17E12		0	A
17E16	X	0.62	A
17E19	X	1.97	A
17E21		5.01	A
17E24 (east and west portions)	X	5.57 (east) 1.18 (west)	P (east) A (west)
17E28	X	3.81	P
17E73	X	1.02	A
19E01 (09N83)	X	0.18	A

<sup>2</sup> Based on visual encounter surveys completed 100 m upstream and 100 m downstream from wet stream crossings and wet meadows and including past occurrence records.

### Yosemite Toad

Yosemite toads occur in habitat crossed by routes 09N01 and 19E01, both of which would be designated open for public motor vehicle use in Alternative 1. Motorized use on these two routes could crush Yosemite toads as they cross the road traveling between dispersal habitats, especially after spring snowmelt. Yosemite toads may also occur in habitat affected by the following un-surveyed routes that would be designated open for public motor vehicle use: 16E26 and 17E24 (east). These routes traverse meadow

habitats where there is potential for vehicles to crush Yosemite toads (if present). Since these routes do not meet Standard and Guideline #100, it is assumed that motorized use on these routes could adversely modify proposed critical habitat. Adverse effects to the hydrologic function of meadow habitat is likely to impact the suitability of reproductive habitat for Yosemite toads at these sites.

*Proposed Critical Habitat:* Routes 09N01 and 19E01, which occur in areas proposed as critical habitat for the Yosemite toad, would be designated open for public motor vehicle use through a Forest Plan Amendment. Yosemite toads are known to occur in habitat along both routes. Since Routes 09N01 and 19E01 were determined to be affecting hydrologic function of meadows, motorized use on these routes may adversely modify proposed critical habitat by altering wet meadow morphology and through changes in the hydrologic function that would degrade Yosemite toad habitat.

**Table 3.13b.** Routes with potential to influence Yosemite toad habitat along portions opened for motor vehicle use in Alternative 1.

Route Number	Does not meet S&G #100	Route Miles in Proposed Critical Habitat	Species Present (P) or Absent (A) <sup>2</sup>
09N01	X	0.67	P
10N01B/10N01	X	0	A
16E26	X	0	Unsurveyed
17E21		0	A
17E24	X	0	A
19E01 (09N83)	X	.44	A

<sup>2</sup> Based on visual encounter surveys completed 100 m upstream and 100 m downstream from wet stream crossings and wet meadows and including past occurrence records.

### Effects of Alternative 2 – No Action

Under the No Action alternative, the same portions of the 42 routes that were closed under the court order would remain closed to public motor vehicle use. No designation of route segments currently closed would be implemented, and Alternative 2 would result in no direct effects to Sierra Nevada yellow-legged frogs, Yosemite toads or their proposed critical habitats.

Indirect effects would still occur as Alternative 2 would not ensure corrective actions to bring routes into compliance with Standard and Guideline #100. As described in the section on Environmental Consequences – Hydrology, the presence of some roads or

trails, even without motorized use occurring, will continue to impact meadow and aquatic habitat (though to a lesser degree), thus affecting habitat for these species.

### **Effects of Alternative 3 – Preferred Alternative**

#### Sierra Nevada Yellow-legged Frog

Six of the routes, or portions of routes, that would be immediately open for public motorized use in Alternative 3 have the potential to affect stream segments or water bodies that may provide habitat for the Sierra Nevada yellow-legged frog. Since each of these routes meets Standard and Guidelines #100, as described in the Hydrology section and shown in Table 3.2, they are unlikely to be impacting meadow habitat or contributing to erosional features at meadows.

Visual encounter surveys indicate that frogs are absent in proximity to wet crossings along these six routes. Erosional features affecting aquatic habitat were not identified along these routes, and any increases in stream turbidity, sediment deposition, or disturbance to riparian vegetation associated with motorized use would likely be localized and limited to stream crossings.

Additional routes (or portions of routes) occur within habitat for the Sierra Nevada yellow-legged frog, but would remain closed for public motor vehicle use until corrective measures to the routes have been implemented, and the Forest Service has determined that the routes are consistent with Standard and Guideline (S&G) #100. Future environmental analysis would be completed during planning of corrective actions and prior to the route being opened for public motorized use. Biological Assessment and conferencing or consultation with the U.S. Fish and Wildlife Service would occur during future analysis if it is determined that corrective actions or public motor vehicle use on these routes may affect the Sierra Nevada yellow legged frog or its critical habitat. Future corrective actions would have a positive effect on SNYLF by improving hydrologic function in meadows or by routing use outside of sensitive meadow habitats.

#### *Proposed Critical Habitat:*

There are two routes (10N01B and 17E21) that occur within areas proposed as critical habitat for the SNYLF and which have potential to influence SNYLF habitat at unimproved wet crossings (Table 3.2). Only the east portion of route 10N01B, prior to crossing a meadow, would be immediately open for motor vehicle use. Similarly, only the west portion of route 17E24, prior to crossing a meadow would be open. These portions, and the opened portion of route 17E21, meet Guideline #100 and no erosional features were noted during field reviews of these routes. The portions of routes 10N01B, 17E24 and 17E21 that would be opened for motorized use in Alternative 3 would not affect the quality of SNYLF habitat. Routes 14N05, 14N58, and 17E17 also occur in

proposed critical habitat and would be immediately opened for public motor vehicle use in Alternative 3. These routes were found unlikely to influence SNYLF habitat because the routes were not located next to wet features and all wet stream crossings had functioning culverts.

**Table 3.14.** Routes with potential to influence SNYLF habitat along portions opened for motor vehicle use in Alternative 3.

Route Number	Does not meet S&G #100	Route Miles in Proposed Critical Habitat	Species Present (P) or Absent (A) <sup>2</sup>
10N01B (10N01) (portion)		0.19	A
10N26		0	A
14N27		0	A
17E12		0	A
17E21		5.01	A
17E24		1.2	A

<sup>2</sup> Based on visual encounter surveys completed 100 m upstream and 100 m downstream from wet stream crossings and wet meadows and including past occurrence records.

### Yosemite Toad

There are two routes that would be immediately opened for public motorized use, and which are within suitable habitat for Yosemite toads: 10N01B (10N01) and 17E21. The portion of route 10N01B (10N01) that would be opened under Alternative 3 does not cross a meadow, and route 17E21 has been determined to not be affecting the hydrologic function of a meadow. These routes were surveyed for Yosemite toads and toads were absent from meadows and stream crossings along these routes.

Routes that would remain closed pending corrective action, would be evaluated and conferencing or consultation with the USFWS would occur, if needed, prior to opening the route for motor vehicle use. Future corrective actions would have a positive effect on Yosemite toad by improving hydrologic function in meadows or by routing use outside of sensitive meadow habitats.

*Critical Habitat:* None of the routes occurring within proposed critical habitat for the Yosemite toad would be immediately opened for public motor vehicle use (Table 33.2b). Routes 09N01 and 19E01, which occur in proposed critical habitat for the Yosemite toad, would remain closed until corrective measures to the routes have been implemented and

the Forest Service has determined that the routes are consistent with Standard and Guideline (S&G) #100. Biological Assessment would be prepared and conferencing or consultation would occur with the U.S. Fish and Wildlife Service prior to these routes being opened, if it is determined that corrective actions or public motorized use on these routes may affect critical habitat for the Yosemite toad.

**Table 3.14b.** Routes with potential to influence Yosemite toad habitat along portions opened for motor vehicle use in Alternative 3.

Route Number	Does not meet S&G #100	Route Miles in Proposed Critical Habitat	Species Present (P) or Absent (A) <sup>2</sup>
10N01B/10N01 (east portion only)		0	A
17E21		0	A

<sup>2</sup> Based on visual encounter surveys completed 100 m upstream and 100 m downstream from wet stream crossings and wet meadows and including past occurrence records.

## Effects of Alternative 4

### Sierra Nevada Yellow-legged frog

Two of the routes that would be immediately open for motor vehicle use under Alternative 4 --10N26 and 14N27-- have the potential to affect stream segments or water bodies that may provide habitat for the Sierra Nevada yellow-legged frog. These routes were surveyed in 2012 and Sierra Nevada yellow-legged frogs were found to be absent. As noted for Alternative 3, erosional features were not identified along these routes, and any small increases in stream turbidity, sediment deposition, or disturbance to riparian vegetation associated with motorized use would likely be limited to stream crossings and would not affect currently occupied habitat.

As described for Alternative 3, routes that would remain closed pending corrective action would be evaluated and conferencing or consultation with the USFWS would occur, if needed, prior to opening the route for motorized use. Future corrective actions would have a positive effect on SNYLF by improving hydrologic function in meadows or by routing use outside of sensitive meadow habitats.

*Proposed Critical Habitat:* Route 14N05 is the only route that would be immediately opened for public motorized use, which occurs in critical habitat proposed for the SNYLF. Field review determined that there are no wet crossings along this route and it would not impact SNYLF habitat.

### Yosemite Toad

None of the routes that would be immediately opened for public motor vehicle use under Alternative 4 occur within the range of the Yosemite toad. Alternative 4 would not designate open any routes that occur within proposed critical habitat for the Yosemite toad.

As described for Alternative 3, routes that would remain closed pending corrective actions, would be evaluated and conferencing or consultation with the USFWS would occur, if needed, prior to opening the route for motor vehicle use. Future corrective actions would have a positive effect on Yosemite toad by improving hydrologic function in meadows or by routing use outside of sensitive meadow habitats.

### **Effects of Alternative 5**

#### Sierra Nevada Yellow-legged Frog and Yosemite Toad

Alternative 5 would initially have the same effects upon Sierra Nevada yellow-legged frogs and Yosemite toads as described for Alternative 1. Impacts occurring to meadows in proposed critical habitat would continue until corrective actions are taken. Over five years, improvements would occur in meadow habitats used by these species as corrections are made to make routes compliant with Standard and Guideline 100.

## Chapter 4. Consultation and Coordination

### Preparers and Contributors

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The Forest Service consulted the following individuals, Federal, State, and local agencies, tribes and non-Forest Service persons during the development of this supplemental environmental impact statement:

#### US Forest Service Interdisciplinary Team Members:

Diana Erickson, Team Leader and Landscape Architect

Steve Markman, Watershed Specialist

Dawn Lipton, Forest Wildlife Biologist

Lester Lubetkin, Forest Recreation Officer

Cathy Bounds, Placerville District Recreation Officer

Debbie Gaynor, Pacific District Recreation Officer

Micki Smith, Amador District Recreation Officer

Jann Williams, Aquatic Biologist

Bill Walker, Engineering/Trails Specialist

Pamela Winn, Engineering Roads and Rights-of-Way

#### Federal, State, and Local Agencies:

USDA Forest Service, Pacific Southwest Regional Office

Alpine County Board of Supervisors

Amador County Board of Supervisors

El Dorado County Board of Supervisors

El Dorado County Sheriff

El Dorado County Fish and Game Commission

California State Parks, Off-Highway Motor Vehicle Recreation Division

California Regional Water Quality Control Board, Central Valley Region

California Department of Fish and Wildlife, Region 2

Tahoe National Forest

Stanislaus National Forest

Lake Tahoe Basin Management Unit

### Tribes:

Jackson Rancheria

Shingle Springs Rancheria

Buena Vista Rancheria of Me-wuk Indians

Washoe Tribe of Nevada and California

United Auburn Indian Community

Ione Band of Miwok Indians

Sierra Native American Council

El Dorado County Indian Council

Colfax-Todd Valley Consolidated Tribe

### **Distribution of the Environmental Impact Statement** \_\_\_\_\_

This supplemental environmental impact statement has been distributed to individuals who specifically requested a copy of the document and those who submitted scoping comments. In addition, copies have been sent to Federal agencies, federally recognized tribes, State and local governments, and organizations.

## Glossary

**All-terrain vehicle (ATV):** A type of off-highway vehicle that travels on three or more low pressure tires, has handle-bar steering, is less than or equal to 50 inches in width, and has a seat designed to be straddled by the operator.

**Corrective Actions:** Site specific actions to ensure proper hydrologic function of meadows. Appropriate actions for each meadow will depend upon the reason the hydrologic function is disrupted at that meadow. Examples of possible corrective actions include reconstructing trails to improve, modify or restore effective drainage, repair or replacement of road or trail drainage structures (culverts, rolling dips, water bars, etc), installation of under-drains such as geotextiles or rock filled segments to allow groundwater to flow past roads or trails, relocation of existing trails or trail segments away from meadows, construction of puncheons or boardwalks to raise trails above the meadow, and repair of damaged meadows through re-vegetation or stream channel restoration projects.

**Designated road, trail or area:** A National Forest System (NFS) road, NFS trail, or an area on NFS lands that is designated for motor vehicle use pursuant to 36 CFR part 212.51 on a motor vehicle use map (36 CFR 212.1).

**Highway-licensed vehicle (highway legal vehicle):** Any motor vehicle that is licensed or certified under State law for general operation on all public roads within the State. Operators of highway legal vehicles are subject to State traffic law, including requirements for operator licensing.

**Motor Vehicle Use Map (MVUM):** A map reflecting designated roads, trails, and areas on an administrative unit or a Ranger District of the NFS (36 CFR 212.1).

**Motorcycle:** A two-wheeled vehicle on which the two wheels are not side-by-side but in line.

**Motorized trail (4WD Trail):** A travel way usually, but not always, less than 50 inches in width, and usually, but not always, available for use by all-terrain vehicles (ATV's) and motorcycles. These travel ways may also be made available to high-clearance four-wheel drive vehicles, and may also be used by bicycles, horses and hikers.

**Public motorized use:** In this document, the term is used to refer to travel by the general public using a motor vehicle which is any vehicle that is self-propelled, other than: (1) a vehicle operated on rails, skids or tracks; and (2) any wheelchair or mobility device, including one that is battery powered, that is designed solely for use by a mobility-impaired person for locomotion **and** that is suitable for use in an indoor pedestrian area.

Motor vehicle in this context includes passenger vehicles, 4WD vehicles, all-terrain vehicles (ATVs), motorcycles, recreational vehicles (RVs), pick-up trucks, utility-terrain vehicles (UTVs), sport utility vehicles (SUVs), all-wheel drive vehicles, etc.

**Road:** A motor vehicle route over 50 inches wide, unless identified and managed as a trail (36 CFR 212.1).

**National Forest Transportation System (NFTS):** The system of NFS roads, NFS trails, and airfields on NFS lands (also referred to as the Forest Transportation System in 36 CFR 212.1).

**Route:** A road or trail.

**Trail:** A route 50 inches or less in width or a route over 50 inches wide that is identified and managed as a trail (36 CFR 212.1).

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## Appendices

### Appendix A: Crosswalk of Road and Trail Numbers \_\_\_\_\_

The following road numbers have been changed since the Final Travel Management EIS:

<b>Road Number previously used in TMFEIS</b>	<b>Name</b>	<b>New Number</b>
09N04	Pardoe 4WD	17E79
09N82 (southern xx miles)	Squaw Ridge Trail	16E26
09N83	Clover Valley/Deer Valley Trail	19E01
10N01	Spur off Woods Lake	10N01B
10N13 northern 6.8 miles)	Strawberry 4wd Trail	17E73
10N21 (whole route)	Long Canyon 4WD Trail	16E27
11N23F	North Shanty Spur	16E33
11N26F	Barrett Lake	16E21
NSR1014A		10N14H
NSR1014AA		10N14HA
NSR1014AB		10N14HB



## Appendix B: Strategy for Planning Corrective Actions \_\_\_\_\_

	Roads	Trails
<b><i>TIER 1**</i></b> <ul style="list-style-type: none"> <li><b><i>Relatively easy corrective actions</i></b></li> <li><b><i>High demand for public use</i></b></li> </ul>	9N08 Stockton Camp 10N98 Jim Quinn Spur 11NY32 47 Milestone	16E21 Barrett 4WD Trail * 16E33 North Shanty Spur
<b><i>TIER 2**</i></b> <ul style="list-style-type: none"> <li><b><i>Relatively difficult corrective actions</i></b></li> <li><b><i>High demand for public use</i></b></li> </ul>	9N01 Blue Lakes* 10N13 Schneider Camp* 10N14 Mule Canyon 14N39 Richardson Lake 10N01 (B) Woods Lake Spur	17E73 Strawberry 4WD* 16E26 Squaw Ridge 4WD * 19E01 Clover Valley/Deer Valley* 17E24 Carson Emigrant Trail* 16E27 Long Canyon 4WD Trail* 17E28 Long Valley MC Trail
<b><i>TIER 3**</i></b> <ul style="list-style-type: none"> <li><b><i>Relatively difficult corrective actions</i></b></li> <li><b><i>Less demand for public use</i></b></li> </ul>	9N95 Cosumnes Head	17E16 Little Round Top MC Trail 17E19 Allen's Camp MC Trail*

\*Corrective actions currently under development or grant proposals in progress.

\*\*Our strategy is to look at Tier 1 routes first, followed by Tier 2 and 3, however corrective actions for routes in any of the tiers may be tied in with a planned funding source or other ecological restoration project which could affect the order in which corrective actions for routes are analyzed.



## Appendix C: Public and Agency Comments

The Notice of Availability of the Draft Environmental Impact Statement (DEIS) was published in the Federal Register on February 22, 2013 and copies of the DEIS were mailed to over 900 individuals, organizations, tribes, and government agencies. The comment period ended on April 8, 2013. Approximately 232 people submitted comments during the comment period. The commenters are listed below in numerical order.

Commenter Number	Date Received	Name	Representing
1	2/21/2013	Bill Karr	
2	2/21/2013	Dan Reid	
3	2/24/2013	Geoff Ho	
4	2/25/2013	Fred Allebach	
5	2/26/2013	Wesley Rubio	
6	2/26/2013	Shaun Harrington	
7	2/26/2013	Jerry Heitzler	
8	2/26/2013	Jere Schaeffer	
9	2/26/2013	Trevor Nielsen	
10	2/26/2013	Donald Spuhler	
11	2/26/2013	Kathy Lewin	
12	2/26/2013	Lucy Badenhoops	
13	2/26/2013	Leon and Rose Richardson	
14	2/26/2013	Mark O'conner	
15	2/26/2013	Dan Dreher	
16	2/27/2013	William Long	
17	2/27/2013	Doug Barr	
18	4/3/2013	Janet Cicero	
19	2/27/2013	Mike Cheney	
20	2/27/2013	Robert Jump	
21	2/27/2013	Larry St George	
22	2/27/2013	Joshua Weir	
23	2/27/2013	Brad Ito	
24	2/27/2013	Jim Stanley	
25	2/27/2013	Mike Devlin	
26	2/27/2013	Cameron Jardine	
27	2/27/2013	Larry Anderson	
28	2/27/2013	John Begin	

29	2/27/2013	Harvey Bolton	
30	2/27/2013	Robert Maclay	
31	2/28/2013	Felipe Riley	
32	3/1/2013	Brent McElwee	
33	3/2/2013	Tim Lopez	
34	3/4/2013	Martin Schumann	
35	3/5/2013	Philip Hall	
36	3/5/2013	Stuart Chappell	
37	3/5/2013	Don Paul	
38	3/5/2013	Geoffrey Beasley	
39	3/5/2013	Jo Snyder Funk	
40	3/5/2013	Duane Olson	
41	3/5/2013	Josh Gisin	
42	3/5/2013	Gordon Winlow	
43	3/5/2013	Richard Pratt	
44	3/5/2013	Timothy Clark	
45	3/6/2013	Jon Swedlund	
46	3/6/2013	Keith Hansen	
47	3/7/2013	Mark Bennett	
48	3/7/2013	Dan Dec.	
49	3/7/2013	Jeff Zeber	
50	3/8/2013	Adam Buske	
51	3/8/2013	Gerry Fogel	
52	3/10/2013	James Siemons	
53	3/11/2013	Shelby Barr	
54	3/11/2013	Craig Pape	
55	3/11/2013	Nathan Diesner	
56	4/3/2013	Andrew Hauger	
57	3/5/2013	Roy Leufkens	
58	3/5/2013	Kathleen Vicini	
59	3/12/2013	Dan Johnson	
60	3/12/2013	Jim Williams	
61	3/12/2013	Wes Glaister	
62	3/14/2013	David Fontana	
63	3/14/2013	Kyle Bross	
64	3/15/2013	Ron Zigelhofer	Trout Unlimited
65	3/18/2013	Timothy Sumrall	
66	3/15/2013	Larry Cabodi	
67	3/21/2013	Steven Hartman	
68	3/22/2013	Justin Kooyman	
69	3/21/2013	Bohumil Vosicky	
70	3/21/2013	Gregory Quintana	

71	3/21/2013	Robert Roddy	
72	3/21/2013	Bill Stone	
73	3/21/2013	Steven Dunn	
74	3/23/2013	Josh Jensen	
75	3/23/2013	Scott Macdonald	
76	3/23/2013	Don Silva	
77	3/25/2013	Rich Colenzo	
78	3/25/2013	Jim Lonl	
79	3/25/2013	Drew Ramsay	
80	3/25/2013	H. Seda	
81	3/25/2013	Rusty Folena	
82	3/25/2013	Christopher Watts	
83	3/25/2013	Lyle Koch	
84	3/25/2013	William Kuhl	
85	3/26/2013	Nathan Holland	
86	3/28/2013	Travis Gio	
87	3/28/2013	Jose Acesedo	
88	3/28/2013	Anthony Cavallero	
89	3/28/2013	Vernon Crebtarr	
90	3/28/2013	Scott Johnson	
91	3/26/2013	Tom Gunther	
92	3/27/2013	Mark Foster	
93	3/29/2013	Richard Parker	
94	3/29/2013	Steve Anderson	
95	3/29/2013	Trevor Froman	
96	3/29/2013	Dave Froman	
97	3/29/2013	Karl Goetz	
98	3/29/2013	Ray Bennett	
99	3/31/2013	Steve Egbert	
100	3/31/2013	Jeff Blewett	
101	4/3/2013	Jennifer Burns	Amador County Board of Supervisors
102	4/1/2013	Neil Netzer	
103	4/1/2013	Bob Balunda	
104	4/1/2013	Richard Adan	
105	4/1/2013	Dale Warmuth	
106	4/1/2013	Gary Henthorn	
107	4/1/2013	Scott Maas	
108	4/1/2013	Joshua Davis	
109	4/1/2013	Dodd Stange	
110	4/1/2013	Jim Fulling	
111	4/1/2013	Frank Havlik	
112	4/1/2013	Jim Stevens	

113	4/1/2013	Don Pizzo	
114	4/1/2013	Ralph Deckard	
115	4/1/2013	David Sweeney	
116	4/1/2013	John Ewins	
117	4/1/2013	Stuart Wik	
118	4/1/2013	Steve Christensen	
119	4/1/2013	James Camerano	
120	4/3/2013	Mesonika Piecuch	ORV Watch Kern County
121	4/1/2013	Com Chewy	
122	4/1/2013	Terry Higginbotham	
123	4/1/2013	Bruce Bodenhofer	
124	4/1/2013	James DeMotto	
125	4/1/2013	Chris Cameron	
126	4/3/2013	Dusti Hall	
127	4/1/2013	Brent Fridrich	
128	4/1/2013	Michael Scott	
129	4/1/2013	Earl Schnell	
130	4/1/2013	Jay Peterson	
131	4/3/2013	Joye Gephart	
132	4/1/2013	Kelly Hart	
133	4/1/2013	Brian Durbin	
134	4/1/2013	Mick Sweeney	
135	4/1/2013	Mark Booker	
136	4/1/2013	Jeri Heiser	
137	4/1/2013	Michael Ewing	
138	4/1/2013	HB Seder	
139	4/1/2013	Todd hanson	
140	4/1/2013	Ben Edam	
141	4/1/2013	Kathleen Goforth	Environmental Protection Agency
142	4/1/2013	Lawerence Calkins	Nevada Four Wheel Drive Association
143	4/2/2013	Terry Jamro	
144	4/2/2013	Jim Watson	
145	4/2/2013	Steven Brown	
146	4/2/2013	Brian Cantrell	
147	4/2/2013	Erik Holst	
148	4/2/2013	David Gunther	
149	4/2/2013	William Crawley	
150	4/2/2013	James Boardman	
151	4/4/2013	Evangelina Moreno	
152	4/2/2013	Keith Ullinger	
153	4/2/2013	Kathryn Hayes	
154	4/2/2013	Frank Funk	

155	4/2/2013	Russell Pereira	
156	4/2/2013	Curt Backhaus	
157	4/2/2013	Raymond Webber	
158	4/4/2013	William Willis	
159	4/2/2013	Ted Hussey	
160	4/2/2013	Pat Patterson	
161	4/2/2013	Robert Cristando	
162	4/3/2013	Ross Ross	
163	4/4/2013	Bruce Hendrickson	
164	4/3/2013	Patrick Peterson	
165	4/3/2013	Richard and Janet Cisneros	
166	4/4/2013	Abigail Borsgard	
167	4/4/2013	Bob Clark	
168	4/4/2013	Mathew York	
169	4/4/2013	Melissa Curtin	
170	4/4/2013	Gregor Losson	
171	4/5/2013	Alan Mortenson	
172	4/5/2013	Jeff Wells	
173	4/5/2013	Elaine Phelps	
174	4/5/2013	Alan Davis	
175	4/5/2013	Keith Davis	
176	4/5/2013	Steve Grover	
177	4/5/2013	Rob Vandergriff	
178	4/5/2013	Jesse Guitierrez	
179	4/6/2013	curtis Kimble	
180	4/6/2013	Kevin Groves	
181	4/6/2013	Mike Fraley	
182	4/6/2013	Jeffery Brown	
183	4/7/2013	George and Frances Alderson	
184	4/7/2013	Rob Andrae	
185	4/7/2013	David Langelier	
186	4/7/2013	Mark Fagerroos	
187	4/7/2013	Harriett Lewis	
188	4/8/2013	Keith Graham	
189	4/8/2013	James Young	
190	4/8/2013	Roger Brown	
191	4/8/2013	Rick Gonsales	
192	4/4/2013	Glyn Zeller	South County Trail-Riders 4 x 4 Club
193	4/5/2013	John D'Agostini	El Dorado County Sheriff
194	4/5/2013	Ron Briggs	El Dorado County Board of Supervisors

195	4/5/2013	Lawerence Holloway	
196	4/5/2013	Jesse Barton	Rubicon Trail Foundation
197	4/7/2013	Terry Woodrow	Alpine County Board of Supervisors
198	4/7/2013	Ken Hower	
199	4/7/2013	Bruce Whitcher	CORVA
200	4/7/2013	Paul Enstrom	
201	4/8/2013	Lori Lewis	
202	4/8/2013	Peter Jones	
203	4/8/2013	Jim Bramham	California Association of 4WD Clubs
204	4/8/2013	Karen Schambach	Center for Sierra Nevada Conservation, CBD, PEER, Wilderness Society, Sierra Forest Legacy, Sierra Club, CNPS, Wildlands CPR
205	4/5/2013	Darla Quaresma	
206	4/8/2013	Monte Hendricks	
207	4/8/2013	Jack and Vickie Kuehl	
208	4/8/2013	Ruthie Loeffelbein	
209	4/8/2013	David and Barbara Rainey	
210	4/8/2013	George Allen	
211	4/8/2013	Crag Clark	
212	4/8/2013	Katlyn Doran	
213	4/8/2013	Del Albright	
214	4/8/2013	Jacquelyne Theisen	
215	4/8/2013	Kevin Carey	
216	4/8/2013	Sherry Stortroen	
217	4/8/2013	Don Amador	Blue Ribbon Coalition
218	4/8/2013	Vicki Perez	
219	4/8/2013	Stacie Albright	
220	4/8/2013	Amy Granat	CORVA
221	4/8/2013	Cecily Smith	Foothill Conservancy
222	4/8/2013	Ole Stortroen	
223	4/8/2013	Ken Clarke	
224	4/8/2013	Michael Damaso	
225	4/8/2013	Travis Feist	
226	4/8/2013	Arthur Stine	
227	4/8/2013	Melanie Munoz	
228	4/8/2013	Dave Pickett	AMA District 36
229	4/8/2013	Joseph Sand	
230	4/8/2013	Cory Borovicka	
231	4/5/2013	Paul Williams	
232	4/8/2013	Richard Everett	

## **Appendix D: Letters from Government Agencies, Elected Officials and Tribes**

Included in this Appendix are copies of the 5 letters received on the DEIS from federal, state, and local agencies, federally recognized tribes, and elected officials.





191  
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

2013 APR -1 APR 18 52  
REGION IX

75 Hawthorne Street  
San Francisco, CA 94105

March 26, 2013

Kathryn Hardy, Forest Supervisor  
Eldorado National Forest  
100 Forni Road, Placerville, CA 95667

Subject: Supplemental Draft Environmental Impact Statement (SEIS) for the Eldorado National Forest Public Wheeled Motorized Travel Management Plan, Alpine, Amador, El Dorado and Placer Counties, CA.

Dear Ms. Hardy,

The U.S. Environmental Protection Agency (EPA) has reviewed the above referenced document. Our review and comments are provided pursuant to the National Environmental Policy Act (NEPA), the Council on Environmental Quality (CEQ) NEPA Implementation Regulations at 40 CFR 1500-1508, and our NEPA review authority under Section 309 of the Clean Air Act.

We have rated this Draft SEIS as LO – Lack of Objections (see enclosed “Summary of Rating Definitions and Follow-Up Action”). EPA notes that, under the Preferred Alternative, all routes currently closed because they do not meet Standard and Guideline (S&G) 100, as it pertains to meadows, would remain closed to public motorized use until the routes are in compliance with S&G 100. We support this approach, and recommend that the Final SEIS include the following additional information and commitments:

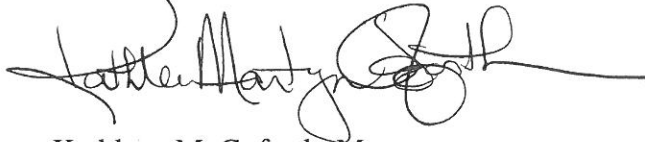
- Specify the criteria that will be used to prioritize route assessments and implementation of corrective actions to bring routes into compliance with S&G 100.
- If, upon further study, the Forest Service determines that corrective actions to bring routes into compliance with S&G 100 are not practicable as a result of funding or other limitations, we recommend that those routes be physically closed to public motorized use (e.g., with locked gates) and that mitigation measures be implemented, to the extent practicable, to minimize continued degradation of the resources at issue.
- If routes may remain closed for several years before assessment and corrective actions will be completed, and if closure postings on those routes have been ineffective in excluding motorized vehicles, we recommend that the Forest Service consider using physical barriers in the interim before the routes are reopened.

EPA also recommends that NEPA documents tiered to this SEIS include the results of comprehensive, up-to-date biological surveys of the Project area. Without such surveys, accurate evaluation of the environmental impacts of the proposed actions would be difficult. The tiered NEPA documents should thoroughly describe and evaluate appropriate corrective action

alternatives; describe best management practices for implementation of corrective actions; identify monitoring measures, including implementation and performance monitoring; and identify follow up measures to be implemented if monitoring indicates that initial efforts were unsuccessful. Moreover, if tiered proposed actions could have significant impacts on the environment, preparation of an environmental impact statement, rather than an environmental assessment, would be appropriate.

We appreciate the opportunity to review this Draft SEIS, and request a copy of the Final SEIS when it is filed with our Washington, D.C. office. If you have any questions, please call me at (415) 972-3843, or have your staff contact Jeanne Geselbracht at (415) 972-3853.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kathleen M. Goforth', with a long horizontal flourish extending to the right.

Kathleen M. Goforth, Manager  
Environmental Review Office

Enclosure: EPA's Summary of Rating Definitions and Follow-Up Action

## **SUMMARY OF EPA RATING DEFINITIONS**

This rating system was developed as a means to summarize EPA's level of concern with a proposed action. The ratings are a combination of alphabetical categories for evaluation of the environmental impacts of the proposal and numerical categories for evaluation of the adequacy of the EIS.

### **ENVIRONMENTAL IMPACT OF THE ACTION**

#### ***"LO" (Lack of Objections)***

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

#### ***"EC" (Environmental Concerns)***

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

#### ***"EO" (Environmental Objections)***

The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

#### ***"EU" (Environmentally Unsatisfactory)***

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the CEQ.

### **ADEQUACY OF THE IMPACT STATEMENT**

#### ***Category 1" (Adequate)***

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

#### ***"Category 2" (Insufficient Information)***

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analysed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

#### ***"Category 3" (Inadequate)***

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analysed in the draft EIS, which should be analysed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

\*From EPA Manual 1640, "Policy and Procedures for the Review of Federal Actions Impacting the Environment."



JOHN D'AGOSTINI  
SHERIFF - CORONER - PUBLIC ADMINISTRATOR  
COUNTY OF EL DORADO  
STATE OF CALIFORNIA

REPLY TO:

☐ HEADQUARTERS  
300 FAIR LANE  
PLACERVILLE  
CA 95667  
530 621-5655  
FAX 626-8091

☐ JAIL DIVISION  
300 FORNI ROAD  
PLACERVILLE  
CA 95667  
530 621-6000  
FAX 626-9472

☐ TAHOE PATROL  
1360 JOHNSON BLVD., SUITE 100  
SOUTH LAKE TAHOE  
CA 96150  
530 573-3000  
FAX 544-6809

☐ TAHOE JAIL  
1051 AL TAHOE BLVD.  
SOUTH LAKE TAHOE  
CA 96150  
530-573-3031  
FAX 541-6721

April 5, 2013

Kathryn D. Hardy  
Forest Supervisor  
El Dorado National Forest  
100 Forni Road  
Placerville CA 95667

RE: Travel Management SEIS

Dear Supervisor Hardy,

Thank you for this opportunity to comment on the Draft Supplemental Environmental Impact Statement for the El Dorado National Forest Travel Management SEIS dated February, 2013.

After careful consideration of all four alternatives proposed in the statement, I strongly recommend alternative #1 as I am opposed to the continued closure of any forest roads restricting access of the citizens to our public lands.

Restricted access to Forest Service Lands has had the contrary effect of the intended goals of restoration and has aided in ecological degradation and directly affects public safety. The most prevalent example of this was exposed during "Operation Mountain Sweep".

In 2012, seized from our public lands around the State of California, between 7/1/12 – 8/14/12, was 606,245 plants, 115 sites, 18 arrests, 18 weapons, and 403 lbs of processed marijuana. The USFS has reported nearly 88% of 3.5 million plants eradicated were from National Forests in California. This cultivation of marijuana was conducted by Drug Trafficking Organizations (DTO), not individuals, trying to make a fast dollar.

Those who intend to profit through illegal activity often search for a suitable area absent of humans who are in a position to protect the forest. The prized areas of marijuana growers are those that have clean water, limited access and sunlight. These are the same attributes that attract wildlife and visitors. The lack of road maintenance, restricted access, and locked gates invite DTOs and prevent citizens, who could, and do, report and

deter unlawful activity, from utilizing the forest lands, while making it difficult for law enforcement or fire services to access.

The negative impact of marijuana sites on Forest Service land is severe. Those who cultivate Marijuana also:

- Dispose of hazardous waste and sewage
- Divert water
- Poach animals
- Use pesticides and rodenticides
- Litter
- Illegally clear cut trees and grade soil causing erosion
- Build illegal structures, wells and camp fires
- Drain tax revenue

If the Standard and Guideline regarding the restoration is to; *"Maintain and restore the hydrologic connectivity of ... meadows ..... by identifying roads and trails that intercept, divert, or disrupt natural surface and subsurface water flow paths. Implement corrective actions where necessary to restore connectivity."* then the far reaching effects of the disposal of hazardous materials human waste and trash, use of poisons and pesticides, diverting water, and grading, conducted by the cultivators will increase.

Full clean-up and restoration of lands damaged by cultivators can range from \$10,000 to \$15,000.00 an acre. Forest Service officials and county leaders have also long complained about the environmental consequences of illegal marijuana farms on forest ecology.

The DTOs also have a direct effect on public safety; they present a serious risk to national forest visitors and employees. Individuals protecting the crops are often armed or set improvised traps.

An article titled "Pot growers are destroying National Forests", written by LiveScience staff writer, Jennifer Welsh, dated December 12, 2011 states, *"The U.S. Forest Service is calling for increased cooperation between government agencies to prevent further forest damage..."* . Law enforcement officials know that to provide public safety they need the assistance of volunteers who care about their communities such as Neighborhood Watch and the Sheriff's Team of Active Retirees (STARS). The National Forest System is no different and no amount of Government agencies can do what the concerned citizens can, by being our eyes and ears.

I have a particular concern with the closure of portions of the Schneider Camp Road or Strawberry Trail. This particular road receives substantial recreational use resulting in a required Search and Rescue response. This road was part of the search area in the Kenny Miller Search in 1992. This search was a 12 day search for an 11 year old autistic boy and is the largest search ever conducted in Alpine or El Dorado counties. Having to break this search area into two separate operational areas would have resulted in unacceptable response times particularly in harsh weather conditions such as those experienced in the Kenny Miller Search.

The Barrett's Lake 4WD Trail 11N26F (16E21) should also remain open in it's entirety to allow access for response and patrol by the Sheriff's Office. The Barrett's Lake Trail will also serve to reduce impacts upon the Rubicon Trail.

The use of the numbered roads to access the National Forest is vital to the Sheriffs Office's mission. Access to all parts of the forest to enforce fish and wildlife laws, off road vehicle laws , environmental protections and provide search and rescue and fire evacuations depends upon the rapid access to the recreational areas. To close any of the existing roads will have substantial impacts upon the Sheriffs Office's ability to perform our public safety mission.

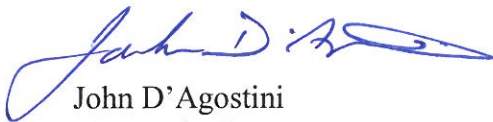
Hunters, fishermen, hikers, and motorists who use the National Forest Lands all have the same goal; they want to preserve and conserve so the wildlife and scenery survive for everyone's enjoyment for years to come. Instead of restricting access citizens should be educated and encouraged to use their national forests.

The last point I would like to make is that of the perception of overreaching government control. The public is already skeptical and untrusting of the federal government's motives. Keeping closed any of the roads in the forest system for an indeterminate amount of time just goes to further that skepticism. These roads need to be open now.

The mitigation of closing of short stretches of forest roads that cross a meadow may create a short term solution for the riparian habitat but may also create long term environmental damage to the forest as a whole as well as endangering the safety of the recreational and commercial users of the forest by restricting the my ability to protect these citizens. I encourage you to take the least restrictive avenue or, alternative #1. These roads need to be open now.

Thank you for considering my concerns and comments

Sincerely



John D'Agostini  
El Dorado County  
Sheriff ~ Coroner  
Public Administrator

# COUNTY OF EL DORADO

330 Fair Lane  
Placerville, CA 95667  
(530) 621-5390  
(530) 622-3645 Fax

**JAMES S. MITRISIN**  
Clerk of the Board



# BOARD OF SUPERVISORS

**RON "MIK" MIKULACO**  
District I  
**RAY NUTTING**  
District II  
**BRIAN K. VEERKAMP**  
District III  
**RON BRIGGS**  
District IV  
**NORMA SANTIAGO**  
District V

PM 3:17

April 2, 2013

Kathryn D. Hardy, Forest Supervisor  
Eldorado National Forest  
100 Forni Road  
Placerville, CA 95667

Subject: Travel Management Draft Supplemental Environmental Impact Statement

Dear Ms. Hardy:

In our previous letter responding to the Notice of Intent to prepare a Travel Management Supplemental Environmental Impact Statement, we expressed confidence in the Proposed Action, namely to 1) designate 13 routes for public motorized use determined to not cross meadows, 2) designate 11 routes that cross meadows but meet Standard and Guideline No. 100, and 3) amend the Eldorado National Forest Land and Resource Management Plan to allow continued public motorized use on 18 routes determined to not currently meet S&G 100. We continue to stress that these actions, now encapsulated in the Draft SEIS as Alternative 1, represent the only acceptable alternative for the citizens of the County of El Dorado.

We hope you agree that Alternative 2 (No Action) is not a practical alternative. Leaving all 42 routes closed while in light of field surveys indicate that 24 routes either do not cross meadows or cross meadows while meeting Standard & Guideline #100 would be draconian disservice to the public.

The financial position of the United States Forest Service must be a consideration with any alternative that proposes future NEPA analyses, corrective actions, and mitigation measures. Alternatives 3 and 4 are difficult to evaluate because there is no discussion of the magnitude of mitigation potentially required on routes, or the priority of route mitigation if and when resources are available. Absent that information, it is difficult to determine whether the environmental benefits of leaving routes undesignated to some future date is sufficient to warrant the extremely negative recreational and economic consequences, especially for high country, high value recreation opportunities. The Forest Service must identify the scope of mitigation required for each route and the priority of route mitigation.

It is the Board of Supervisors strong belief that the Forest Service will not have required resources to accomplish the analyses and mitigation suggested through Alternatives 3 and 4. With no funding to accomplish mitigation, leaving 18 undesignated for use until future NEPA analyses and mitigation measures are completed is akin to keeping the public off of these routes in perpetuity. Specifically, Alternative 3 forecloses on 14 of only 25 high country, high recreation value routes, which represents 73% of the total high country, high recreation routes. Alternative 4 appears even more severe, closing nearly all of the high country, high recreation value routes, including 15 routes or portions of routes that studies indicate do not cross border meadows, or do so while meeting Standard & Guideline #100. Moreover, both Alternatives 3 and 4 unacceptably close significant portions of routes not identified in the litigation.

2013 APR -5 PM 3:17

The four most frequented Off Highway Vehicle (OHV) trails in the County of El Dorado include the Barrett Lake Trail (16E21), the Strawberry Creek Trail (17E73), the Deer Valley Trail (19E01) and the Rubicon Trail. Like the Rubicon, Strawberry Creek and Deer Valley trails are both highway connectors that facilitate recreational access in and out of the County. Closure of three of the "big four" OHV trails will undoubtedly result in increased use of the Rubicon Trail and Forest Service roads. The Forest Service is very aware of the County's investment in the Rubicon Trail and our commitment to maintaining it.

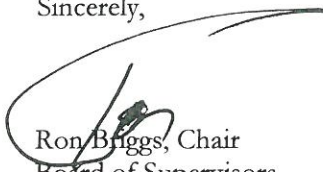
The Draft SEIS does not analyze the cumulative environmental effect of restricting usage to a reduced number of available routes. In addition, the local economy will suffer as the supply for high country, high value OHV opportunities is diminished. Though the Forest Service has analyzed the recreational and environmental values of each of the 42 routes, no analysis of the economic and social value of the loss of these routes has been undertaken. Prior to closing any routes the Forest Service must analyze the economic and social impact to the County of El Dorado and plan to mitigate such impacts or abandon alternatives that close routes.

Another concern related the Rubicon Trail is the proposed closure of 14N39. This route is the only trail of the 42 at issue that has direct connection to the Rubicon Trail. The County has mitigated up to the beginning of 14N39 only to have the Forest Service propose closure. The Forest Service should not close this important route and should prioritize its opening.

These roads have been in use for decades and some for a century. They are "essential" for effective communications, public safety, and circulation. They also provide for access to the recreation and unique, irreplaceable travel routes for our taxpayers citizens to access the land in which they own.

Again, we strongly urge you to adopt Alternative 1. Considering the obvious and quantifiable consequences these route closures have on public safety and the cultural and economic impact to the citizens of the County, this is the only acceptable alternative.

Sincerely,



Ron Briggs, Chair  
Board of Supervisors  
County of El Dorado

## BOARD OF SUPERVISORS

810 COURT STREET \* JACKSON, CA 95642 \* (209) 223-6470 \* FAX (209) 257-0619



March 26, 2013

Kathryn D. Hardy  
Forest Supervisor  
Eldorado National Forest  
100 Forni Road  
Placerville, CA 95667  
[Comments-pacificsouthwest-eldorado@fs.fed.us](mailto:Comments-pacificsouthwest-eldorado@fs.fed.us)

Dear Forest Supervisor Hardy:

We appreciate the opportunity to comment on the Draft Supplemental Environmental Impact Statement (DSEIS) for the Travel Management Project. We also appreciate the open house that was held in Jackson on March 6. Of the four alternatives, Alternative 1 is the most preferable, but with reservations. We recommend a modified alternative within the range of Alternatives 1, 2 and 3.

The sole focus of the alternatives is to address compliance with Standard and Guidelines #100. The S&G has a dual focus to maintain and restore the hydrologic connectivity of the stream, meadows, etc. The goal is accomplished through two requirements. First, by identifying roads and trails that intercept, divert, or disrupt natural surface and subsurface water flow paths. The Forest Service is in full compliance with this requirement by identifying 18 out of the 42 roads that intercept, divert or disrupt water flow paths. Alternatives 1, 2 & 3 each release the 24 roads that do not impact meadows and address the 18 roads that do impact meadows. Parts of Alternative 4 are outside the scope of this SEIS by designating all or parts of the 24 compliant roads closed; some permanently and others until mitigated for impacts not related to S&G #100. It also permanently closes many of the 18 roads that do impact meadows without considering potential correction measures. These road closures are outside the scope of this SEIS and must be removed from consideration in this Alternative.

The second requirement in S&G #100 is to implement corrective actions, where necessary, to restore connectivity. By admission in the SEIS, none of the Alternatives implement corrective actions, or even identify corrective actions. Therefore, under all alternatives, the Forest Service will remain non-compliant with S&G #100.

Alternative 1, 2 and 3 are all similar in on-the-ground results, except that Alternative 1 would allow motorized vehicle use while corrective measures are being developed, the other two would close the roads until corrective actions are implemented. Alternative 3 is identical to the no action Alternative 2 except that 3 specifies closure only until corrective actions are implemented but it is implied in Alternative 2 since there will be no reason to keep roads closed after compliance is met. Each of the alternatives are based on a supposition that motorized use cannot be authorized without compliance with S&G #100 and a hostage is needed to ensure corrective actions are implemented.

The S&G was adopted for all new activities. Driving on these roads is not a new activity. In most cases it is a very, very old activity. Some roads date back to the stage coach days. One is a section of the old Highway 88. Another is part of the main immigrant trail to California blazed by Kit Carson, constructed by Mormon pioneers in 1848 and used by thousands during the gold rush. Another is the wagon road to Calaveras Big Trees. We question the need for an amendment to the LRMP given the historic nature and use of these roads.

The S&G requires implementation of corrective action where necessary. The key phrase is "where necessary". The SEIS needs to conduct an analysis by meadow to determine if road closure is a necessary corrective action. The SEIS acknowledges in each of the alternatives that closure, by itself will not provide corrective action and that adverse impacts will continue after closure until corrective measures are implemented. In many cases, the road, not the use is the primary obstruction. For example, 11 meadows are affected by roads or trails that intercept and divert water from the meadow. Withholding motorized use will not correct water diversion. While motorized traffic may cause some impacts in some meadows, the burden of the analysis is to determine "necessity". The scoping document used the term "substantial" to define necessity. The SEIS must assess whether motorized use contributes measurably to the adverse flow of water to specific meadows. If so, restrictions on motorized use may be appropriately considered. If not, there is no reason to curtail motorized use. For many roads, perhaps all roads, motorized use has little or no impact to the meadows.

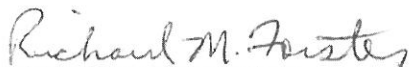
The SEIS should also suggest some appropriate temporary mitigation measures it will consider on an individual meadow by meadow basis. For example, where use does impact water flow, consider mitigation measures that can be implemented until corrective actions can be completed such as wet-road restrictions. As two commenters to the scoping document requested, there should be some discussion about how much vehicular use a road will receive when soils are saturated; the time when rutting or other damage to meadow roads is most likely to occur. Thirty-three of the thirty-eight meadows are affected by run-off from the roads. Consider listing some standard control devices that can be employed for temporary relief, such as rip-rap, erosion matting, and water bars.

We urge the Forest Service to reconsider adjustments to these alternatives to enable compliance with S&G #100. We call your attention to the phrase "implement corrective actions". It does not require completion, but implementation. It is expected that implementation will occur over a number of years. The Forest Service should consider actions on all elements of corrective actions as inclusive of implementation. For example, proceeding along a schedule of corrective action elements could be considered implementation. The schedule could include: pursue funding, develop partnerships, evaluate the impacts caused by motorized use, prioritize meadows, install appropriate temporary mitigation measures, conduct a NEPA analysis and complete corrective actions. The most important direction from this SEIS is to begin implementation of corrective actions, not withdraw public use.

We urge you to refine an alternative that falls within Alternatives 1, 2 and 3. Such an alternative would release the 24 roads that either do not affect meadows or are found in compliance with S&G #100. For the 18 roads not found in compliance, provide a preliminary assessment for the necessity of corrective actions, and where necessary, establish a plan for the development of corrective actions, the implementation of which will provide compliance with S&G #100. Include an evaluation of the necessity for temporary mitigation measures.

We thank you for the opportunity to comment and offer our assistance in developing appropriate corrective actions.

Sincerely,



Richard M. Forster, Chair  
Amador County Board of Supervisors



**COUNTY OF ALPINE**  
**Board of Supervisors**  
99 Water Street  
Markleeville CA 96120

April 5, 2013

Kathryn D. Hardy  
Forest Supervisor  
Eldorado National Forest  
100 Forni Road  
Placerville, CA 95667  
[Comments-pacificsouthwest-eldorado@fs.fed.us](mailto:Comments-pacificsouthwest-eldorado@fs.fed.us)

Dear Forest Supervisor Hardy:

We appreciate the opportunity to comment on the Draft Supplemental Environmental Impact Statement (DEIS) for the Travel Management Project. Of the four alternatives, Alternative 1 is the most preferable to Alpine County. Three of our Alpine County roads fall into the category of the 18 routes that cross or border at least one meadow that does not meet Standard and Guideline No. 100. Alternative 1 would Amend the Eldorado National Forest Land and Resource Management Plan (ENF LRMP) as amended by the Sierra Nevada Forest Plan Amendment (SNFPA) Standard and Guideline No. 100 (S&G 100) to allow continued public motorized use on the 18 routes that field surveys determined to not currently meet S&G 100, and designate those routes for public use. This Alternative 1 would allow motorized vehicle use while corrective measures are being developed.

The S&G was adopted for all new activities. Driving on these roads is not a new activity. As stated in our letter to you on July 3, 2012, two of the three roads in Alpine County, Blue Lakes (09N01) and Clover Valley/Deer Valley Trail (09N83) are part of a historical interconnected roadway that forms a north-south link between Highway 88 and Highway 4. This roadway has been utilized for centuries, even before Alpine County was formed, to navigate the Sierra Nevada Mountains and is designated as an RS 2477 roadway. This roadway is a critical avenue connecting the only two east-west state highways in Alpine County.

The S&G requires implementation of corrective action where necessary. The key phrase is "where necessary". The SEIS needs to conduct an analysis by meadow to determine if road closure is a necessary corrective action. The SEIS acknowledges in each of the alternatives that closure, by itself will not provide corrective action and that adverse impacts will continue after closure until corrective measures are implemented. In many cases, the road, not the use, is the primary obstruction. Some of the meadows are affected by roads or trails that intercept and divert water from the meadow. Withholding motorized use will not correct water diversion. While motorized traffic may cause some impacts in some meadows, the burden of the analysis is to determine "necessity". The scoping document used the term "substantial" to define necessity. The SEIS must assess whether motorized use contributes measurably to the adverse flow of water to specific meadows. For many roads, perhaps all roads, motorized use has little or no impact to the meadows.


Eldorado National Forest  
April 5, 2013  
Page 2 of 2

The SEIS should also suggest some appropriate temporary mitigation measures it will consider on an individual meadow by meadow basis. For example, where use does impact water flow, consider mitigation measures that can be implemented until corrective actions can be completed such as wet-road restrictions. Consider listing some standard control devices that can be employed for temporary relief, such as rip-rap, erosion matting, and water bars.

We urge the Forest Service to reconsider adjustments to these alternatives to enable compliance with S&G 100. We call your attention to the phrase "implement corrective actions". It does not require completion, but implementation. It is expected that implementation will occur over a number of years. Proceeding along a schedule of corrective action elements could be considered implementation. The most important direction from the SEIS is to begin implementation of corrective actions, not to withdraw public use.

The County understands that the Court has placed the Forest Service in a role that is not of its choosing. It is the Board's desire to work with you to improve the negative impacts on our County, its citizens and visitors who are an important part of our local economy. We look forward to meeting with you at the April 19th meeting in Amador County to discuss this further.

Respectfully,

A handwritten signature in cursive script, reading "Terry Woodrow".

Terry Woodrow  
Alpine County Board of Supervisors, Chair

cc: Rick Hopson Amador District Ranger [rhopson@fs.fed.us](mailto:rhopson@fs.fed.us)



# United States Department of the Interior

OFFICE OF THE SECRETARY  
Office of Environmental Policy and Compliance  
Pacific Southwest Region  
333 Bush Street, Suite 515  
San Francisco, CA 94104

IN REPLY REFER TO:  
(ER 13/0105)

*Filed Electronically*

08 April 2013

Kathryn Hardy, Supervisor  
Eldorado National Forest  
100 Forni Road  
Placerville, CA 95667

Subject: Draft Supplemental Environmental Impact Statement (DSEIS), USDA Forest Service (USFS), Travel Management Supplemental Environmental Impact Statement (SEIS), Eldorado National Forest, El Dorado County, California

Dear Ms. Hardy:

The Department of the Interior has received and reviewed the subject document and has no comments to offer.

Thank you for the opportunity to review this project.

Sincerely,

Patricia Sanderson Port  
Regional Environmental Officer

cc:  
Director, OEPC  
OEPC Staff Contact: Lisa Treichel



## Appendix E: Response to Comments on Draft SEIS

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## Access

I support the plan with the least amount of closures and restrictions. I would also encourage the forest service to keep trails open when problems are discovered and continue to work with 4 x 4 groups and organizations to fix the problems.

Commenter: 15

**Response:** Alternative 1 provides for the least amount of closures and restrictions. The forest intends to continue working with a variety of user groups to maintain and improve routes across the forest.

We have a growing sport that needs a growing trail system. Please consider that families that ride together stay together.

Commenter: 22

**Response:** The forest acknowledges the growing sport. The FSEIS states on page 64, “many users have established treasured family traditions of bringing the older family members along on trips ...” The analysis in this FSEIS addresses only the 42 routes closed by the court.

The multipurpose use of our forestlands appears to be dwindling. With my access to the outdoors being tied to my OHV (because of my physical limitations) any use of the outdoors I lose further lowers my quality of life.

Commenter: 27

Please strive to keep all the historic routes open to motorized use. Those of us with physical disabilities still love the outdoors and love to visit scenic and historical places with our kids and grandkids but we CAN’T HIKE. Motorized access is all we can use and we lose more of it every year.

Commenter: 43,

**Response:** The forest acknowledges the importance of motorized access. The FSEIS stated on page 64, “High elevation trails provide access to remote areas on the forest especially for older and less able individuals who might otherwise not be able to enjoy these areas.”

Please re-open these and other new routes for off-road use. My kids and I would love to vacation and ride in those areas.

Commenter: 28

Please keep the Eldorado forest open to the public for off roaders.

Commenter: 32

As most everyone knows and appreciates the Sierra Nevada Mountains offer many opportunities to those who have “access” that are not found in many parts of the country today. All of these routes have provided these opportunities for decades and have undergone tremendous scrutiny over the last decade or so. I believe these areas CAN and SHOULD be open to ALL access groups and the responsibility of cooperative maintenance and management is an absolute MUST.

Commenter: 40

The previous FMTP (Alternative 1) that exempted the 42 routes from closure had already reduced meadow routes to a minimum, was protecting the meadow resource, and meeting LRMP standards and guides for public access. This level of meadow roading in Alternative 1 represents the minimum required to meet S&G 4 and 5 of the LRMP by public consensus.

Commenter: 232

**Response:** Alternative 1 provides for the least amount of closures and restrictions. The analysis in this FSEIS addresses only the 42 routes closed by the court.

I need you to know that ANY restriction to access effects my recreation.

Commenter: 39

**Response:** The Forest Service acknowledges impacts to user groups and describes them in the FSEIS in the effects to public motor vehicle use.

These historic routes are the last way to see and enjoy the pure beauty of the ENF. The closure of these routes will only increase traffic on routes elsewhere. Please restore these routes to the responsible public as soon as possible.

Commenter: 48

Please keep our forests accessible to us and do not remove any of our trails we have. By closing more areas you will make more impact on the areas that are open and we all lose. Please keep and expand the access that we have to better manage the impacts on our National Forest route system.

Commenter: 19

RTF is particularly disappointed that 16E21, 17E73, and 19E01 are to be closed until mitigation is completed because their use is similar to that of the Rubicon Trail. RTF is concerned that closure until mitigation of these trails will cause additional traffic on the Trail, and no analysis of this consequence was made. This analysis should be completed and any effects should be mitigated.

Commenter: 196

**Response:** A discussion of impacts from displaced traffic has been added to the FSEIS on page 84.

Do the right thing! Keep all the trails open. If there is an issue, build a new trail around a meadow. Maybe you already know this and it's your strategy, the more trails closed, puts more OHV'ers fewer trails creating more impacts on the land.

Commenter: 51

I want the public to have access to their own lands (meadows and beyond) and I want roads with adverse impacts in meadows to be repaired.

Commenter: 232

**Response:** Alternative 1 provides for the least amount of closures and restrictions. Alternatives 3 and 4 recognize the need for corrective actions which may include reroutes around meadows. A site specific analysis for corrective actions will be completed at a future date. A discussion of recreation impacts from displaced traffic has been added to the FSEIS on page 84.

I urge you to reconsider closing them off to the public. Every time my family, friends and I go we make a point to leave our campsites cleaner than we found them. We always bring extra garbage bags to clean up other campsites along the way and also to pick up cans thrown on the sides of the trail. Perhaps more posting of 'no littering' signs, more Forest Service employees on duty to enforce rules in the area, heightening the cost of tickets for littering or providing a few more bear-proof dumpsters along the trail could help. There are hundreds of wheeling trails in our area, and it would be terrible if they all got closed one-by-one because of human waste.

Maybe issuing articles with the problems that are caused on the trail will make people understand how their actions can be detrimental to the surrounding area. I know I'm not the only one who loves these trails, so I see it making a difference. There are many alternatives to closing them down, we just need to explore them.

Commenter: 53

**Response:** The forest recognizes the contribution of user groups and individuals efforts at keeping the forest clean. The FSEIS is focused on impacts to meadows and compliance with S&G 100. Alternative means of addressing impacts to hydrologic connectivity are discussed in the Hydrology effects section on page 54 of the FSEIS.

I was extremely dismayed last year when due to another "lawsuit" that the Deer Valley trail was shut down denying me and my family our yearly camping trip into this area. I am writing to urge you to reopen these trails and not let environmental extremist sue their way to closing all of our lands.

Commenter: 61

**Response:** Alternative 1 reopens the 42 routes including the Deer Valley trail. However, the Forest Supervisor must consider the effects of damage to meadows with the objective of minimizing those effects.

Let me give you one example of one of the 42 road closures that are taking away our opportunities to enjoy our land – Deer Valley Trail. This trail connects from Blue Lakes area off Highway 88 to Hermit Valley area on Highway 4. My family has made Blue Lakes an annual camping spot for over 30 years. The Deer Valley Trail looks just as beautiful today as it did 30 years ago. I understand the concern about meadows and streams, but “really” is there a need to close this road? Why? I know if you put it out there and said that if you didn’t want us driving our jeeps through the streams you would get enough volunteers to make a bridge. There are many 4 wheel drive clubs with wonderful families who join together for recreation and who would love to join together for projects such as this. What a great way to work with the public instead of against us. Let’s use all the interest generated from these unnecessary road and trail closures to bring together the public and forest service to solve the issues. Remember that government is by and for the people and should not be a bureaucratic brick wall that reasonable people beat their heads against. I urge you to listen to reasonable suggestions such as this and to carry our message forward in the spirit of collaboration.

Commenter: 62

**Response:** Alternative 1 reopens the 42 routes including the Deer Valley trail. The FSEIS discussed impacts to meadows from continued motorized use (pages 52-53). Under Alternative 3, corrective actions would be implemented once site specific analysis has been completed. The forest may work with volunteers to complete the repairs when feasible. **Alternative suggestions have been included into the FSEIS. An additional alternative, Alternative 5, was brought forward by many commenters and analyzed in detail.**

You give us little to go on with these alternatives the idea of closing any of these routes is immoral and unethical on all points. I support Alternative 1 since I have little choice in the matter and strongly condemn 2, 3, and 4 with an overall condemnation of Alternative 3. Doing nothing is again immoral and unethical on the part of our government. You have many supporters that will stand and volunteer to keep these routes safe and legal please do not lose sight on us we care about our forest and we want these routes opened.

Commenter: 65

After careful review of the SEIS document, the N4WDA urges the acceptance of Alternative 1 for the Record of Decision. Our members, although primarily residing in Nevada, stand by, willing to help with mitigation of the issues on these trails.

Commenter: 142

**Response:** Alternative 1 provides for the least amount of closures and restrictions. The forest intends to continue working with a variety of user groups to maintain and improve routes across the forest including the implementation of corrective actions on these routes.

We need to allow everyone to enjoy all that this great FREE world has to offer. Promoting responsible use of our natural resources and allowing everyone to experience what there is to be part of, not for the taking, is vital.

Commenter: 84

**Response:** The forest acknowledges the importance of motorized access.

The public has already seen wheeled motorized access to the ENF limited to just a small fraction of what it was prior to the "2008 Public Wheeled Motorized Travel Management Decision", and the closure of these routes means the loss of 90% of the remaining motorcycle trails open to the public in the ENF above the 6000' elevation, and 53% of the 4-Wheel Drive trails above that elevation.

Commenter: 156

**Response:** The public motor vehicle use section of the FSEIS, page 77, acknowledges that in Alternative 2, there would be a loss of access to motorcycle and 4WD trails in the high country. The effects of alternative 2 and the other alternatives are also displayed in Table 3.11 on page 80.

Alternative number one is the only option presented, from a motorized use perspective, which would maintain an acceptable level of historic access to the last routes in what was already a diminutive dysfunctional motorized forest transportation system. These high

value routes had still allowed for some semblance of a quality motorized travel experience to remain in the ENF.

Commenter: 167,

**Response:** Alternative 1 provides for the least amount of closures and restrictions. Alternatives 3 and 4 recognize the need for corrective actions and provides for use of additional trails following implementation of the fixes.

## Alternative 1

I support Alternative 1 as it opens the greatest amount of trail for public use in the shortest amount of time.

Commenter: 3,

**Response:** Correct, Alternative 1 does open the greatest amount of trails for public use.

I support Alternative 1. Re-open the 42 routes to motorized travel. I am hoping that if Alternative 1 isn't chosen that Alternative 3 is. It seems that trails that cross meadows could be re-routed around them to minimize the impact of wheeled travel. Re-routing these trails make more sense than closing them or trying to build and maintain a trail that doesn't impact the meadow.

Commenter: 9

Alternative 1 appears to be the best solution with Alternative 3 the next best solution.

Commenter: 16

**Response:** We acknowledge your support for Alternative #1. Alternatives 3 and 4 recognize the need for corrective actions which may include reroutes around meadows. A site specific analysis for corrective actions would be completed at a future date.

I support Alternative 1 to keep routes open. Closure to motorized trail riding will only lessen State funding from the people who pay for maintenance. Closures will cause California people to seek family spending money in other states for vacations. Consequently then, less tax in spending, less funds for maintaining roads.

Commenter: 13

Deer Valley, Pardoe, Strawberry, Barret Lake just to name a few should NOT be closed! Our family goes and runs these trails every year!! The economic impact alone will be significant to the areas around these trails! The small towns in these areas rely on recreation in the NF.

Commenter: 203

**Response:** This document is tiered to the 2008 Travel Management FEIS which addressed economic impacts of route closures.

I support Alternative 1.

I strongly support Alternative 1 in the DSEIS. Most of the 42 routes addressed by the DSEIS never impacted meadows and should never have been closed. The other routes were justified by the Forest Service originally, and additional site specific analysis apparently reinforced that. It will be more cost effective for the Forest Service in the long run to challenge the plaintiffs now and defend the original TMP and subsequent site specific analysis, rather than concede defeat and have the plaintiffs exploit the precedent with future litigation. I strongly advocate the ENF adopt Alternative 1.

I am in favor of Alternative 1. Opening these routes would allow use by recreational motorists now and the Forest Service can still prioritize exempt routes for future analysis and propose implementation of corrective actions where necessary to restore hydrologic connectivity. Unreasonable delay in opening routes due to lack of funding would be eliminated.

Commenter: 10, 14, 23, 58, 92, 192, 195

I strongly support Alternative 1 of the SEIS, the “Proposed Action” that the Forest Service came up with as a result of the site specific analysis that was completed on the 42 routes involved in this matter.

Commenter: 156,

Please consider Alternative #1 of the SDEIS, the “Proposed Action” for the currently closed 42 routes. The other three alternatives that were developed during the scoping process would degrade public access and recreation opportunities that have already become severely limited. These routes have functioned without issues for many years as documented in the previous analysis performed.

Commenter: 163,

I support Alternative 1 as proposed in October and do not support Alternative 3 with the closure of 18 trails for planning and corrective actions. I also believe that Alternatives 2 and 3 are too radical to even consider.

Commenter: 10

Of the four alternatives, Alternative 1 is the most preferable to Alpine County.

Commenter: 197

I support Alternative #1, the Proposed Action. My wife and I regularly traverse the trails in our Jeep on the Eldorado NF and enjoy our outdoor experience. We wish for nearby trails such as Clover Valley/Deer Valley (09N83), Schneider Camp/Strawberry (10N13, and Barrett 4WD (911N26F) to be reopened as soon as possible.

Commenter: 207

We urge adoption of Alternative 1 and hope for a speedy reopening of these trails. The closure of the ENF trails has caused a noticeable impact on the adjoining forests due to the concentration of enthusiasts having to relocate for their recreation.

Commenter: 211

The OHMVR Commission encourages the adoption of the SEIS alternative that allows the 42 routes to be reopened to public use as quickly as possible. Any recommended route treatments should be combined with visual inspections by USFS staff to facilitate timelier public access to these valuable recreational resources in the dry summer months.

Commenter: 218

BRC is appreciative of the efforts that you and your staff undertook in development of the DSEIS. BRC believes it is critically important for the agency to restore access to ALL of the “meadow routes” included in the DEIS’s Alternative 1. Those routes are an integral and appropriate part of the minimally functional network of motorized trails proposed for designation in the 2008 FEIS/ROD. Preceding the 2008 decision was a “court-ordered” 2,340 miles of system routes with some of the additional existing and long-travelled “unauthorized” routes designated for motorized use. Instead of validating this court- approved reduction of historical access, Modified Alt. B further reduced the motorized route mileage to approximately 1,800 miles. While this was the most access-friendly of the alternatives, BRC continues to believe that all of the 2008 FEIS/ROD alternatives were closure alternatives and substantially decreased the linear mileage of roads and trails for continuing use.

Commenter: 217

The Merced Dirt Riders (MDR) support the Proposed Action **Alternative 1** of the 42 Routes DSEIS. These 42 routes are very high value recreational roads and trails. The MDR supports the amending of the Eldorado National Forest Land and Resource Management Plan (ENF LRMP), Standard and Guideline 100, to allow for public motorized use on sections of routes affecting the hydro-logic connectivity of meadows on 18 of the 42 routes.

Commenter: 224

**Response:** The Forest acknowledges your support of Alternative 1.

I then urge all of you to make action plan ONE as the decision on the course of action for the trails of the ENF. As a member of the Blue Ribbon Coalition, Cal 4WD association and Vice President of the Battle Born Cruisers of Northern Nevada, I would like to offer any assistance and resources that I have to help facilitate these repairs as quickly as possible.

Commenter: 46

**Response:** The Forest acknowledges your support of Alternative 1. The Forest intends to continue working with a variety of user groups to maintain and improve routes across the Forest including the implementation of corrective actions on these routes.

I am in favor of Alternative 1 because it would immediately open the 42 routes that were closed for no good reason and allow them to be used by motorized access which is what was intended with the original Forest travel plan. These trails should have never been closed in the first place and an amendment to the LRMP is the logical course of action for correcting the matter. Please make sure trail 14N39 to Richardson Lake is included in Alternative 1. This is a popular trail which I would like to see reopened.

Commenter: 91, 231

**Response:** Amending the LRMP to include 14N39 is proposed in Alternatives 1 and 5. Road 14N39 Richardson lake is included in both alternatives.

Alternative 1 is the most preferable, but with reservations. We recommend a modified alternative within the range of Alternatives 1, 2, and 3.

Commenter: 10

**Response:** We have modified Alternative 1 and created Alternative 5 based on public comments. The full descriptions of these alternatives are included in Chapter 2 of the FSEIS.

Reviewing the original DEIS and the ongoing EIS work and proposed alternatives, I am glad to see the scope of the discussion being reduced to the subset of routes with actual meadow impact. That said, reviewing the alternatives, I think the approach in Alternative 1 is preferable, with the following comments:

- open the currently closed routes
- identify the priority of mitigation of the remaining impacted routes
- spell out the precise work required on each route to bring them into compliance

- propose a schedule for mitigation
- engage with the various user groups to solicit work parties and assistance to bring the routes into compliance.
- note to the user groups that the routes will only remain open contingent upon 'adoption' of the trail / work to ensure compliance

Commenter: 226

**Response:** The Forest acknowledges your support for Alternative 1. A Strategy for Planning Corrective Actions has been included in Appendix B. The Forest intends to continue working with a variety of user groups to maintain and improve routes across the Forest including the implementation of corrective actions on these routes.

Alternative 1, the 'proposed action' would reopen all 42 routes. It clearly does not align with the Forest Service's own ecological restoration goals, the Record of Decision, and S&G 100.

Commenter: 221

**Response:** The Forest acknowledges your concern with the Proposed Action. Four other alternatives were also developed and analyzed in this FSEIS.

We explicitly oppose Alternative 1 because it involves giving exceptions to S&G 100 for certain routes. That would mean continued degradation of the lands and waters. It would mean a degradation of the public values of the ENF, contrary to the laws that govern our national forests.

Commenter: 183

**Response:** The Forest acknowledges your opposition to Alternative 1.

## Alternative 2

I oppose Alternatives 2 and 4 completely as the loss of these trails will not be recovered thereby hurting all users.

I am not in favor of Alternative 2 as it would continue to close the 42 routes to motorized access and prevent me from using many of my favorite trails in the Forest.

Commenter: 3, 91

I oppose Alternative 2. This “No Action” alternative permanent closure of the 42 routes is completely unreasonable and meritless.

Commenter: 195

Alternative 2 would keep closed all portions of the 42 routes closed by the court order. Without proposed mitigation for meadow damage by public motorized users, the alternative does not align with Forest Service’s own ecological restoration goals, the Record of Decision, and S&G 100. Since Alternative 4 does not recommend mitigation for damage done by public motorized users, it should not be adopted as proposed.

Commenter: 221

Closing routes to motorized use does not achieve Standard and Guideline 100, as the Draft SEIS acknowledges in several places. Therefore Alternative 2 does not meet the requirements of Judge Karlton’s Order, nor by extension the ENF’s stated Purpose and Need.

Commenter: 221, 225

**Response:** The continued impacts on meadows from route closures in Alternative 2 are recognized, and a discussion of this may be found on pages 53 of the FSEIS.

### Alternative 3

I oppose alternative 3 since the remediation work needed to re-open the trails will take years to complete due to budget restraints.

I oppose Alternative 3. This alternative has the potential to result in permanent closure of the routes in question under the guise of Forest Service project prioritization and lack of funding.

Commenter: 3, 195,

I am not in favor of Alternative 3 as it does not open 18 of the 42 routes until the routes are brought into compliance. This would require significant funding to implement and it appears the Forest Service will have funding shortfalls for the foreseeable future which would result in these trails being permanently closed.

Commenter: 91

I'm very concerned about the proposed alternative that the FS is considering as a final conclusion regarding our NF in the Eldorado. My family and I recreate and use the Eldorado NF every year and to even consider closing any roads is a travesty! I went to the Jackson meeting and I was told that Alt 2 was going to be preferred which means that 18 of our most treasured trails will be closed until they are "fixed". That can take years!! We cannot stand for that! We have the man power and means to do whatever it is that the FS needs to "fix" whatever the issues are right now, not over a period of years!

Commenter: 219

We are concerned that Alternative 3 (DEIS - preferred alternative) was developed late in the process because the Forest anticipates likely opposition from anti-access special interests who will attempt to read some substantive component into the Court's order or otherwise suggest that the law requires closure of any of the following routes: 09N01, 09N08, 09N82 (16E26), 09N83 (19E01), 09N95, 10N01, 0.5 miles of 10N13 (Schneider Camp Road), 6.8 miles of 10N13 (17E73; Strawberry Cr. 4WD trail), 10N14, 10N21, (16E27; Long Canyon 4WD trail), 10N98, 11N23F (16E33), 11N26F (16E21; Barrett 4WD trail), 11NY32, 14N39, 17E16, 17E19, 17E24, 17E28. As noted above, this type of anticipatory negotiating against itself has never benefitted the agency, and BRC would respectfully suggest the agency focus on doing what is right for the resource and the majority of the trail-using public rather than trying to appease the perpetually disgruntled minority.

Commenter: 217

**Response:** The Forest acknowledges your concerns about Alternative 3. As discussed on page 78 of the FSEIS, the corrective actions will take time and money for planning and implementation.

As a member of Back Country Horsemen of California, Mother Lode Unit, I want to express my support for Alternative 3.

Commenter: 7

I vote for Alternative 3.

Commenter: 11, 44

Preferred Alternative is okay.

Commenter: 66

On behalf of the members of the El Dorado Chapter of Trout Unlimited, we agree with your preferred alternative, Alternative 3. Alternative 3 appears to best comply with the basis for the court's decision, the existing standards, is consistent with your specialist recommendations and with good old common sense as that may apply to protection of the fisheries. Alternative 3 best protects these meadows until the requisite repairs are completed. The other alternatives would further degrade these meadows, decrease their wetness and allow sediment to fill these meadows. We agree that there needs to be a balance between recreation and preservation of the resources. Since the primary function of the Forest Service is to protect our natural resources, we applaud your decision to temporarily curtail motor vehicle usage in these areas until such time as the needed repairs have been completed. To do otherwise would be to abandon your duties to preserve this Forest.

Commenter: 64,

I believe that Alternative 3 is a step in the right direction.

Commenter: 147

Of the four alternatives proposed in the DSEIS, PCTA supports Alternative 3, the Preferred Alternative.

Commenter: 68

D36 prefers Alt. #1 and should be the preferred alternative – but believes the ENF should stand by Alt #3 with modifications to avoid “potential future litigation” and yield to the judicial system as outlined within the Court Order with suggested corrective action.

Commenter: 228

**Response:** The Forest acknowledges your support for Alternative 3.

If Alternative 3 is chosen it is really important to me as a summer resident at Silver Lake to see Squaw Ridge, Mud Lake, Allen Camp, Caples to Strawberry and the Clover Valley Highway trails open. These trails provide good rides, loops and destinations that the smaller “deadend” trails don’t.

Commenter: 58

**Response:** Alternative 3 does not identify the order in which corrective actions would be taken; however, the Forest is actively seeking funding to complete the analysis for the corrective actions on the routes you have listed. Our Strategy for Planning Corrective Actions is displayed in Appendix B of the FSEIS.

We support your approach and recommend that the FSEIS include the following additional information and commitments:

- Specify the criteria that will be used to prioritize route assessments and implementation of corrective actions to bring routes into compliance with S&G 100.
  - If, upon further study, the Forest Service determines that corrective actions to bring routes into compliance with S&G 100 are not practicable as a result of funding or other limitations, we recommend that those routes be physically closed to public motorized use (e.g. with locked gates) and that mitigation measures be implemented, to the extent practicable, to minimize continued degradation of the resources at issue.
  - If routes may remain closed for several years before assessment and corrective actions will be completed, and if closure postings on those routes have been ineffective in excluding motorized vehicles, we recommend that the Forest Service consider using physical barriers in the interim before the routes are reopened.
- 1.

Commenter: 141

**Response:** Appendix B has been added to the FSEIS to display the criteria for prioritizing routes for corrective actions. Alternatives 3 and 4 have been modified to incorporate the suggestions to identify the most appropriate method to exclude public motorized use.

I am concerned that the DSEIS Alt. 3 addresses only the effects of roads on meadow hydrology, omitting other riparian resources and wetlands - which would probably result in opening all 42 roads.

Commenter: 208

**Response:** The Forest acknowledges your concern with Alternative 3. As explained on page 1 of the TM FSEIS, this SEIS addresses the additional information and analysis relative to the 42 specific routes, meadows, and Standard and Guideline 100 in the Eldorado NF.

Alternative 3, the preferred alternative, would open the 24 routes deemed not to affect meadows. It would keep 'closed' portions of the 18 routes that do not meet S&G #100. However, they would remain part of the National Forest Transportation System (NFTS). They would be re-designated for public motorized use when the meadows become compliant with S&G #100. We recommend the following changes to Alternative 3, the preferred alternative:

- 1) The 18 routes that do not meet S&G #100 should remain closed to public motorized use after appropriate corrective action.
- 2) Identify a strategy for corrective action on these routes which includes appropriately weighted ecological factors noted above.
- 3) Schedule future hydrological assessments of the 11 routes that currently meet S&G #100 to ensure compliance with Riparian Conservation Objective.
- 4) Do a 'needs' analysis to determine if those 11 routes through meadows are "needed for safe and efficient travel for administration, utilization and protection of National Forest System lands." This analysis should include all of the other roads and trails in the system and the Forest Service's inability to maintain them now.
- 5) Based on the expanded needs assessment, "establish priorities and a time schedule to decommission or close unneeded roads."
- 6) Close Trail 17E21 and Route 10N32 for the reasons noted above.
- 7) Include Alternative 4's closure of routes that affect other important resource concerns.

Commenter: 221,

**Response:** Suggestion 1 from the commenter does not provide the reason for not allowing motor vehicle use following implementation of corrective actions. The effects analysis displayed for Alternative 4 is similar to Suggestion 1 for at least some of the routes that do not meet S&G 100.

**Response:** A Strategy for Planning Corrective Actions for the 18 routes has been included in Appendix B. While it does not specifically incorporate a rating for ecological values of the meadows, it is assumed that all of the meadows are important. It is likely that work planning and available funding will play a greater role in scheduling of the planning for the corrective actions. The routes of greatest ecological concern have already been included in grant applications and are being built into the Forest Service program of work at this time.

Setting a schedule for completing future hydrological assessments of the 11 routes that currently meet S&G #100 to ensure compliance with Riparian Conservation Objectives, as suggested in Suggestion 3, is outside of the scope of this SEIS.

Completion of a travel analysis to determine the minimum road system, as in Suggestion 4 is not required to complete the determination of whether to allow public motor vehicle use of the 42 routes analyzed in this SEIS. Expanding the analysis to include all other roads and trails in the system is beyond the Purpose and Need for the SEIS. The Federal District Court decision of May 26, 2011 recognized that “the Forest Service’s decision not to first complete the [Travel Management Rule] Subpart A analysis [before the Subpart B designation of roads for public use] was neither arbitrary nor in violation of the procedures required by law.”.

Suggestion 5 is outside of the scope of the SEIS.

As suggested in Suggestion 6, closure of Trail 17E21 is included in Alternative 4.

Suggestion 7 is already included in Alternative 4 and the effects analysis is displayed for that alternative.

## Alternative 4

Adopt Alternative 4 as it offers the best balance between vehicle travel in the high country and protection of fragile alpine habitat.

Commenter: 18

I have determined that Alternative 4 is the wisest option. Alternative 4 would immediately open certain routes that don't impact wetlands, and open others after mitigation. It closes a handful of routes to OHVs that would impact meadows. These routes are located in areas that not only adversely impact streams and other wetlands, but also potentially harm wildlife species. Closed routes would be decommissioned, which would provide an opportunity to restore wetland hydrology.

Alternative 4 provides balance between OHV use in the high country and the protection of fragile alpine habitat. We are asking you to comply with all BMPs in the Forest Service Water Quality Management Plan, not just RCO #100. While the SEIS re-visits recreation issues, it must also include serious consideration of all resources issues.

Commenter: 120

I urge you to adopt Alternative 4; as it offers the best balance between vehicle travel in the high country and protection of fragile alpine habitat. In addition, I believe it is important to comply with all Best Management Practices in the Forest Service Water Quality Management Plan, not just RCO #100; and please, as you consider recreation issues, take into account all resource aspects, including ecology.

Commenter: 153

I am support of Alternative 4. I believe with the conservation groups that Alternative 4 makes the best balance vehicle use in the high country of the ENF and the protection of fragile alpine habitat. You must comply with all BMP in the FS Water Quality Management Plan, not just RCO #100. If the SEIS revisit recreation issues, it must also revisit and take a thorough look at all resource issues. Recreation cannot just be singled out.

Commenter: 206,

Please adopt Alternate 4, for reasonable balance, and comply with all the Best Management Practices in the FS Water Quality Management Plan. Alt. 4 does include decommissioning closed roads and restoration of wetlands and hydrology. If the SEIS re-visit recreation issues, it must also take a serious look at all resource issues.

Commenter: 208,

**Response:** The Forest acknowledges your support for Alternative 4.

I am not in favor of Alternative 4 for reasons similar to number 3. I believe postponing the decision to reopen a number of the trails into the future will only result in the permanent closure of these trails. Plus I am not in favor of having 21 trails permanently closed as proposed in this alternative.

Commenter: 91,

I oppose Alternative 4. This is a land grab beyond the court order and would likely result in permanent closure of the routes in question under the guise of Forest Service project prioritization and lack of funding. I can't speculate on the mitigation for resources concerns not directly related to S&G 100.

Commenter: 195,

Alt# 2 & 4 are not acceptable. The NO action alternative (#2) is as total closure is NOT acceptable to the public and is unreasonable, which in turn may/will cause litigation. Alt #4 opens some routes, but access to meadows – some in use that could be construed as “prescriptive easements” by merit of historical use including pre-motorized, is also not acceptable as an alternative. Please review 212.9 (5) and 212.55 (d) (1) (2)

Commenter: 228,

**Response:** The Forest acknowledges your opposition to Alternative 4.

Alternative 4 includes closure of 2.26 miles of 9N04 and 10N03. Neither route was listed in the court order. Furthermore Alternative 4 would close .053 miles of 9N54 even though it was found not to cross or border meadows. There is no supporting information in the SEIS to justify closure of these routes. Because consideration of these routes is not consistent with the Statement of Purpose and Need these routes should be removed from the SEIS.

Alternative 4 lists seven routes where corrective measures would be implemented that are not related to meadows and S&G #100 (page 49). The seven routes are: 08N23B, 08N35, 09N04 (17E79), 10N03, 10N32, 10NY06, and 12NY15. These routes either do not cross or border meadows or meet S&G #100. Although mitigation may be indicated per the project record these routes should be removed from consideration in the SEIS because this is inconsistent with the Statement of Purpose and Need and outside the scope of the document. Furthermore these routes were previously determined to meet designation criteria in the Travel Management FEIS so the basis for requiring mitigation is questionable.

Commenter: 199

[Routes] 14N58, 14N39, 10NY04, 17E12, 17E21 and the portions of 14N05 on the ALT 4 maps seem to indicate closure for no apparent reason. The maps and SDEIS clearly identify locations previously shown as meadows, either as “not meadows” or are in compliance with S&G 100. Simply closing this trail for any length of time is “arbitrary and capricious”. Further, there is a significant conflict within the document that does not allow the reader to coincide the condition of these roads with the ALT4 maps. “*An ENF LRMP Amendment is not required for these routes*” is all it says in the description in ALT 3 and only refers to these routes on the map and the meadows indicated are “not meadows” or comply with S&G100, yet they are listed as to be closed in ALT4. Allow these roads and trails to remain open to public use while actively pursuing funding for any needed corrective action. Actively recruit and utilize existing AAT volunteers to begin immediate work to correct problem areas.

Commenter: 90, 198

Parts of Alternative 4 are outside the scope of this SEIS by designating all or parts of the 24 compliant roads closed; some permanently and others until mitigated for impacts not related to S&G # 100. It also permanently closes many of the 18 roads that do impact meadows without considering potential correction measures. These road closures are outside the scope of this SEIS and must be removed from consideration in this Alternative.

Commenter: 101

Route 17E17 is proposed for closure in Alternative 4, yet this route borders only one meadow that actually meets S&G 100 according to the field report. In particular closure of this trail should not be included in Alternative 4 because no justification is provided based on resource issues. This trail should remain open to public motorized use in all action alternatives.

Commenter: 199

**Response:** As stated on page 19 of the FSEIS, Alternative 4 was created in response to comments and suggestions received during public scoping. The Forest intends to continue working with a variety of user groups to maintain and improve routes across the Forest including the implementation of corrective actions on these routes.

## Alternatives

I am for any Alternative that recognizes there isn't a meadow on road segment 11N09A (Alternatives 1, 3, and 4).

Commenter: 12

**Response:** Table 2.2 of the FSEIS shows that road 11N09A does not cross or border a meadow. The Forest acknowledges your support for Alternatives 1, 3, and 4.

Of the four Alternatives the selfish side of me would be that all of the routes remain open but I think the more sensible plan would be to close some until the mitigation work can be done. There are three routes that I would encourage you to keep open while the work is being done to protect the meadows is being accomplished. I traveled on these trails very often and think they are extremely important to many people. The routes are Long Canyon 16E27, Strawberry 17E73, and Clover/Deer Valley 19E01.

Commenter: 177

**Response:** Alternative 5 was developed based on public comments to amend the LRMP to designate routes until corrective actions could be completed. Long Canyon 16E27, Strawberry 17E73, and Clover/Deer Valley 19E01 were included in that alternative.

We heartily support the closure of vehicle routes that cross meadows where traffic has degraded their habitat function and ability to hold water into the summer season. Restoration of the watershed values and natural meadow ecosystems should be the highest priority. Vehicles should be allowed on such routes only where the Forest Service has determined a route to be sustainable under Standard & Guideline 100 without deterioration of meadow habitat function. We urge the Forest Service to implement fully S&G 100.

Commenter: 183

**Response:** The Forest acknowledges your support of meadow restoration. Full implementation of S&G 100 is incorporated into Alternatives 3 and 4. Corrective actions for routes closed but not meeting S&G100 have been added to Alternative 4.

We urge the Forest Service to reconsider adjustments to these alternatives to enable compliance with S&G 100. Proceeding along a schedule of corrective action elements could be considered implementation.

Commenter: 197

We urge the Forest Service to reconsider adjustments to these alternatives to enable compliance with S&G #100. We call your attention to the phrase "implement corrective actions". It does not require completion, but implementation. It is expected that implementation will occur over a number of years. The Forest Service should consider actions on all elements of corrective actions as inclusive of implementation. For example, proceeding along a schedule of corrective action elements could be considered implementation. The schedule could include: pursue funding, develop partnerships, evaluate the impacts caused by motorized use, prioritize meadows, install appropriate temporary mitigation measures, conduct a NEPA analysis and complete corrective actions. The most important direction from this SEIS is to begin implementation of corrective actions, not withdraw public use.

Commenter: 101

**Response:** The above comments were considered with development of Alternatives 1 and 5. Alternative 1 would open all of the 42 routes to public motorized vehicle use, and does not require corrective actions to the 18 routes that do not meet S&G #100 within any specific period of time. Alternative 5 would open all of the 42 routes to public motorized vehicle use and gives the Forest Service up to five years to implement corrective actions to the 18 routes that do not currently meet S&G #100.

We wish to express our support of a hybrid alternative between alternative #1 and alternative #3, the preferred alternative. This hybrid would include the following elements:

- These routes would be managed as open for motorized recreation.
- Routes that have been identified to be in noncompliance would be opened with a seasonal closure. This seasonal closure would be lifted, using a similar criterion to what is currently used on the Barrett Lake Trail. A uniform set of standards would have to be outlined so the Court and the public have a clear understanding of the standards and guidelines that would be used to govern the seasonal closures.
- Creation of a working group to oversee these routes.
- Before these routes could be opened, an adopt-a-trail agreement must be in place between a club or responsible organization that agrees to take the voluntary leadership role in trail maintenance and mitigation efforts.
- Any improvement, upgrade, maintenance, or mitigation that can be done within the current footprint of the trail is done as rapidly as possible using a categorical exemption.

- Spring and late fall monitoring and photo documentation of the meadow areas would take place annually so that adjustments may be made proactively.
- Set schedule with mandatory completion dates for mitigation on these routes. Two to five years depending on the route and the complexity of the mitigation. This would create a sense of urgency, not only for the agency, but the OHV Division, and most certainly the public.

Commenter: 203

BRC believes that a modified Alternative 3 will rightfully restore connectivity of the skeleton route network proposed in the 2008 FEIS/ROD. Failure to designate these routes could actually harm the physical environment by creating a motorized trail network of insufficient size, scope, and diversity to meet the Forest's purpose and need for public access, as well as any common sense backbone transportation network sufficient to satisfy and properly disperse public use of the Forest.

Commenter: 217

**Response:** Alternative 5 was developed based on public comments to amend the LRMP to designate the 18 routes that do not meet S&G #100 open while corrective actions are completed. This Alternative incorporates a mandatory completion date for corrective actions. In addition, a Strategy for Planning for the corrective actions is included in Appendix B. The proposal to implement a wet route closure was considered and is discussed in the FSEIS on page 22 under Alternatives considered but not analyzed in detail. The Forest intends to continue working with a variety of user groups to maintain and improve routes across the Forest including the implementation of corrective actions on these routes.

BRC suggests the affected routes are designated as open on an interim basis until the final mitigations are implemented. They will be managed on that interim basis using a hybrid wet-weather closure period that starts on November 29 and ends on April 1 or when said routes are looked at on-the-ground by a Forest specialist and found to be in a state that can support summer motorized wheeled travel.

Commenter: 217

A better solution would be to keep the roads closed until they are dry enough to cross without aggravating the disturbed areas in the meadows. It has also been our experience rather than to have a major project to repair the disturbed areas, performing corrective maintenance will usually have a better, less intrusive effect.

Commenter: 210

Establish an interim wet weather/seasonal closure plan for the 42.4 miles of trails that do not meet S&G 100 which would allow the trails to be part of the system. Conditionally designate the trails open once the interim wet weather closure plan is adopted.

Commenter: 38

**Response:** The proposal to implement a wet route closure was considered and is discussed in the FSEIS on page 22 under Alternatives considered but not analyzed in detail, together with the reasons why.

Routes left open under non-significant plan amendments in the FEIS ROD include:

Roads: 09N01 09N04 09N82 09N83 10N01 10N13 10N14 10N21 10NY06 11N23F 11N26F 12NY15 14N05 14N39

NFS Trails: 17E12 17E17 17E19 17E21 17E24 17E51

There appears to be no good reason why the routes listed cannot remain open under a non-significant Forest Plan amendment as described in the Proposed Action and the FEIS/ROD.

Commenter: 199,

**Response:** All of these routes are proposed to be designated for public motorized use under Alternatives 1 and 5, except 17E51 which was not designated for public motorized use in the 2008 FEIS and ROD.

Alternatives 2 and 4 are completely invalid in the context of this SDEIS, and should be **removed**, or **substantially revised** to adhere to all actual “Relocation” and/or “Reconstruction” as required by BMP 4.7.1.

Commenter: 200,

The release of the DSEIS presented the public with two new alternatives that indicated a drastic change in direction from the proposed action as presented in the Notice of Intent (NOI). Instead of listening to the myriad of comments from supporters of the proposed action in the NOI, the ENF chose to develop two very similar alternatives (#3 & #4) that would affect motorized users of the forest with virtually the identical end result, the closure of the most popular, high recreational value motorized roads and trails in the Eldorado National Forest. But other than Alternative #1, the proposed action, there is no alternative presented to the public that takes the high recreational values of these roads and trails into account.

The motorized public is left with virtually no choice or alternative that suits their needs, as the Forest states early in the DSEIS that they have suddenly changed direction and will no longer consider issuing an LRMP to cover use on the roads and trails needing

mitigation, giving the public a very clear message that ‘Alternative #1 will not be considered’. Whether those words are actually in writing or not, the message comes across very clearly; *but no other option or alternative is given to retain motorized use on these highly valued routes!*

The motorized enthusiast public is presented with an all or nothing scenario, with little in the document as pertains to alternatives to support. This violates both the spirit and tenor of the National Environmental Policy Act (NEPA) per section 1505.1(e); “...a reasonable number of examples, covering the full spectrum of alternatives, must be analyzed”. There is nothing reasonable in presenting two virtually identical alternatives to the public, and no options left for the motorized public to support. Therefore the Forest has violated NEPA because of the lack of reasonable alternatives.

In short, the Forest has been extremely shortsighted in the development of the alternatives in the DSEIS and ignored many of the precepts espoused by NEPA. There is also a disservice that has been done to the public by ignoring the very real ramification likely to be experienced by local residents, and the harm these closures will cause. All in all, there is a paucity of analysis in the DSEIS that is represented by a lack of reasonable alternatives for the public to consider. The ENF must remand this document to reevaluate reasonable alternatives that identify all potential impacts, and offer the motorized enthusiast public an alternative worth considering.

Commenter: 220,

The document does not provide an alternative that meshes with the facts provided. Many possible and reasonable alternatives could have been developed for consideration, but were not, suggesting that the end result of this process was pre-decided.

Because there is no legitimate justification to close trails, Alternative #1 is the only marginally acceptable alternative, as it is closest to a true “no action” alternative.

Commenter: 229

**Response:** The NEPA regulations (40 cfr 1502.13 (D)) require the “No Action” alternative be displayed and that the agency consider a reasonable range of alternatives based on issues brought forward during the initial public scoping period while meeting the Purpose and Need. Alternatives 3, and 4 were developed in response to multiple comments received during scoping. Alternative 3 was designed to open the routes after S&G 100 is met. Alternative 5, described on page 21, in the FSEIS was developed to address comments received on the Draft SEIS.

The 18 routes that the Forest Service acknowledges have damaged meadows should receive special attention and future management consistent with the Leadership

Direction. Routes through damaged meadows should be decommissioned rather than reconstructed. The 11 routes that cross meadows but do not currently affect hydrologic connectivity should be periodically monitored for changes in condition and placed on a time schedule for future decommissioning.

Commenter: 221

**Response:** As explained on page 2 of the Draft EIS in the Background Information the 2008 Travel Management EIS and ROD designated Roads and Trails to be open for public motor vehicle use in accordance with leadership direction. Future monitoring for routes that cross meadows but do not currently affect hydrologic connectivity is planned in the 2008 ENF TM FEIS Monitoring Strategy. Decommissioning of routes is outside the scope of this SEIS.

The Draft SEIS has a major fatal flaw: The ENF was supposed to “rigorously determine and evaluate all plausible alternatives.” Judge Karlton’s Order very specifically applies to only the portions of the 42 routes that intersect meadows and do not meet Standard and Guideline 100. This totals less than 5 miles of routes, and the ENF has had ample time to examine these problem areas and propose mitigation measures. Yet none of the Alternatives presented in the Draft SEIS suggest ways to bring these problem areas up to Standard and Guideline 100, as required by Judge Karlton’s Order. Instead, the ENF has proposed a blanket approach of closures to motorized use (Alternatives 2, 3 and 4) or exceptions (Alternative 1) that do nothing to achieve Standard and Guideline 100. The ENF has a very simple directive: Repair and/or reroute the less than 5 miles so that they meet Standard and Guideline 100. Closures to motorized use do not achieve this directive, as acknowledged in the Draft SEIS. The ENF needs to create a SEIS that identifies mitigation measures so that the portions of routes in question meet Standard and Guideline 100.

Commenter: 225

This order given by Judge Karlton is specific as to the analysis to be performed, but it is also noteworthy for the language it does not contain. In no place in Judge Karlton’s Final Order, or any previous rulings, is it implied or otherwise stated that the end result of this analysis would or should be the closure of any of these 42 routes. In fact the word ‘closure’ is not contained in the court order, other than the reference to the continuation of a temporary closure previously mandated by the court.

CORVA can find no instance where the Forest has similarly been ordered to forgo analysis on mitigation measures for any road or trail found to cross a meadow. The lack of this analysis causes the Forest to fail to meet the oft-mentioned Riparian Conservation Objective Standard and Guideline #100 (S&G100). In fact, CORVA contends that the entire objective of S&G100 mandates an analysis of mitigation measures needed to bring roads and trails into compliance.

As stated on page 4 of the DSEIS, the definition of S&G100 used in the course of this analysis calls for the Forest to; “Maintain and restore the hydrologic connectivity of streams, meadows, wetlands, and other special aquatic features by identifying roads and trails that intercept, divert, or disrupt natural surface and subsurface water flow paths. Implement corrective actions where necessary to restore connectivity.” The entire structure and premise behind S&G100 is action-oriented; it recognizes that action should be taken to “maintain and restore” connectivity, two actions that cannot take place on their own. Furthermore it should be noted that S&G100 does not mention the concept of closing these areas to motorized (or other forms of) travel. Rather it rightly recognizes the need for on-the-ground work to “implement corrective actions”. If closure had been a proper course of action, those words could have been included in the definition of S&G100 when it was written, but no words of this nature were included.

Commenter: 220, 223

As shown through the entire DSEIS, the ENF conducted an on-site analysis of each one of these trails but fell woefully short of meeting requirements contained in S&G100, and also failed to meet the intent behind Judge Karlton’s order. The analysis to bring any of the roads and trails needed into compliance was not addressed, analyzed or even considered. Therefore, this document must be remanded and an analysis performed that brings the Forest into compliance both with the court order and S&G100.

Commenter: 220

The concerns raised along these routes via their intersection with our proximity to a meadow will not end with any form of vehicle travel limitations. The routes will continue to exist, the hydrological concerns will not be addressed, and no improvement in water quality or meadow health can be expected. It is the presence of water, not vehicles, that is the concern. To punish today’s visitors for concerns about historic placement of these routes is simply not good public policy. It would appear that the three bars that must be met in this planning document are 1) no irreversible damage, 2) limiting wet condition wheeled travel, and 3) no adverse modification.

Commenter: 203

**Response:** As described in the background section on pages 3 and 4, the Court order prohibited public wheeled motorized vehicle use on the 42 routes until such time as the Forest Service completes a SEIS. Alternatives 3, 4 and 5 were developed in response to comments and include the requirement for corrective actions to be analyzed and implemented in a separate NEPA analysis. The analysis for the corrective actions would require additional engineering and design work. The Forest has developed a strategy to prioritize this work that is included in Appendix B of this document.

I believe that the expeditious opening of all 42 trails is imperative. There are so many responsible people who are being adversely affected by these trail closures as the analyses are being conducted by the USFS. Please reconsider the opening of these trails while a suitable plan can be set in place to address the issues at hand. Time is of the essence.

Commenter: 227

**Response:** Alternative 5, described on page 21, was developed and added into the FSEIS to address comments received on the Draft SEIS.

I contend this SEIS is inadequate because the Forest failed to “rigorously determine and evaluate all plausible alternatives”. This failure occurred at two tiers in the decision process of this supplemental EIS. First tier: The Court gave the Forest the option to adhere to or amend “riparian conservation objectives” of the SNFPA (Order (Dkt. #76) at 58-63). In plain language, Judge Lawrence Karlton gave the Forest Service two (2) viable alternatives to resolve the 42 Route issue: A) amend the SNFPA “no roads shall cross or bisect meadow: rule or B) change the Forest Travel Management Plan to adhere to the Forest “no meadow road” rule. In the eyes of the Court amending the “no meadow road” rule was a very plausible alternative. An EIS alternative of amending the Forest “no meadow road” rule was not presented to the public in the SEIS. The Forest chose only to present one of the Judges alternatives to the public: to modify the former FMTP to adhere to the “no road rule”. The Forest must provide plausible alternatives for consideration.

Commenter: 232,

There is environmental case law that indicates the “no meadow road “rule is illegal when applied in multiple use management areas. As applied the “no meadow road rule” closes wheeled access to, across and beyond the meadows. A previous “no road” rule was found to limit certain uses and development activities such as road construction and timber management”. This component of the previous 2001 Roadless Area Conservation Rule (roadless rule) was found to violate the Wilderness Act of 1964 (2003, U.S. District Court for the District of Wyoming).

Commenter: 232,

**Response:** The 2004 Sierra Nevada Forest Plan Amendment, Record of Decision does not prohibit roads and trails through meadows, but rather requires that roads and trails through meadows meet the Riparian Conservation Objectives (RCOs) and associated Standards & Guidelines (S&Gs). This SEIS focuses on S&G #100 in order to meet the requirements of the following Court Order: Case No. 2:09-CV-02523-LKK-JFM (United States District Court, Eastern District of

California, filed 7/31/12). An analysis of the Wilderness Act of 1964 and other environmental case law is beyond the scope of analysis of this SEIS.

The “routes may not intersect or bisect meadows” consistency criteria (sometimes referred to as the “no meadow road” rule) that was as the grounds for road closure is entirely an Eldorado National Forest construct and is not a SNFPA RCO standard and guide (s&g) nor is it part of the LRMP.

Commenter: 232,

The Statement in the Supplemental EIS that the judge found 42 roads in error with the SNFPA is at best a half truth. After the Forest chose not to amend its own “no meadow road” rule that the judge was required to find the 42 routes to be in error of the Forest Plan. To state the Judge found the 42 Routes in error of the SNFPA is misleading and amounts to placing side-bars on the plausible SEIS alternatives to be considered by the public.

Commenter: 232,

Nowhere in the SNFPA or the 2004 ROD does it recommend or suggest the unilateral closure of all roads in meadows as a response to RCO#2 or Rule #100. The administrative flexibility built into the S&G’s under ROC#2 are not carried forward into the Forest’s “no meadow road” consistency criteria-Why?

The change in flexibility from the draft consistency criteria that was congruent with the other S&C’s in ROC#2 to the “no meadow road” extreme position needs to be explained.

Commenter: 232,

The RCO#2 and Rule #100 were both written in an effort to protect the meadow resource. The Forest “no meadow road” rule was written based on” potential adverse impacts” by keeping meadow roads open. Nowhere has there been a corresponding assessment of adverse impacts to the meadow resulting from road closure?

Commenter: 232

**Response:** As described in the background section on pages 3 and 4,, the Court order prohibited public wheeled motorized vehicle use on the 42 routes until such time as the Forest Service Completes a SEIS. As described on page 2 of this SEIS, the Sierra Nevada Forest Plan Amendment replaced the ENF LRMP Standard and Guideline that restricted routes through meadows. There is not a “no meadow road rule”. Alternatives 1 and 5 of this FSEIS do propose a LRMP amendment as suggested.

The SEIS deals solely with the 42 Routes, but solutions to recreation-use/ riparian restoration conflicts may be found in adjacent Forest routes with or without meadow occurrence.

By court order this EIS deals solely with the 42 closed roads, but it does not preclude the Forest from looking outside the 42 routes in determining alternatives. There are opportunities for recreation vehicle use on other previously closed meadow routes (those without adverse road impacts) as substitutes for any of the 42 routes that are required to be closed.

Commenter: 232

A plausible EIS alternative would be to substitute previously closed roaded meadows routes (no meadows present or no adverse impacts) for any of the 42 routes with adverse roading impacts. This process would allow the Forest to maintain the appropriate level of high country recreation vehicle use as required by LRMP S&G 4 & 5. In fact the substitution process for closed roads has been in place since the LRMP of 1989 (Page 2-19).

Commenter: 232

**Response:** In an effort to expedite the analysis and decision, this SEIS focuses on just these 42 routes. As described in the 2008 TM FEIS, at any future time the Forest could look at other routes for public motorized use.

You must immediately open all of the 42 routes that were closed, (subject to normal seasonal closures). The court order has been satisfied. The 14 routes that do not cross of border meadows need to be opened up immediately; (subject to normal seasonal closures). These routes are listed in Table 3.9

The 10 routes that cross or border meadows AND MEET S&G 100 need to be opened up immediately, (subject to normal seasonal closures). The 18 routes that cross or border at least one meadow and do not meet S&G 100 need to be re-opened by including a Forest Plan Amendment that will provide an exception to S&G 100. The DSEIS identified those routes as being "rated high in recreational value". Too many high elevation routes were closed with the TMFEIS. Any more closures would be detrimental to the human environment. The DSEIS states that the action must achieve the purpose of "providing a diversity of wheeled motorized recreation opportunities". This cannot be achieved if these 18 routes are closed. The DSEIS states, (pg 55), that closing the routes does not correct the reason(s) that the route does not meet S&G 100. The routes should remain open while corrective measures are being done. The DSEIS states, (pg 71) that up to 11.2 miles of routes will be lost if these 18 routes remain closed which is un-acceptable. There has been too much route loss already.

Commenter: 222,

**Response:** As described in the background section on pages 3 and 4,, the Court order prohibited public wheeled motorized vehicle use on the 42 routes until such time as the Forest Service Completes a SEIS. Alternatives 1 and 5 would result in all routes in this SEIS being opened.

While the Preferred Alternative (Alternative 3) is more acceptable than the Proposed Action (Alternative 1), we believe it would still result in significant impacts on the human environment, violate several Best Management Practices of Off Highway Vehicles as prescribed in the Water Quality Management Handbook; and would violate the criteria for minimization as outlined in Executive Orders 11644 and 11989 and the Travel Rule.

The Forest Service has made no attempt to minimize impacts from these route designations, much less to even disclose the full impacts from the proposal. This must be remedied before a final EIS and decision is produced.

Commenter: 204

**Response:** The discussion of effects of Alternative 3 in the Hydrology section has been expanded in relation to Best Management Practices and minimization criteria. See pages 51 – 52.

Alternative 4 strikes a balance between immediately opening many routes to motorized travel while requiring mitigation before others are opened, and permanently closing routes with impacts to resources that cannot be mitigated, or that would require unrealistically expensive mitigation, such as total relocation. We urge you to adopt Alternative 4, including the restoration of all closed routes.

Commenter: 204

The only management action to restore meadows mentioned in the SEIS is road closure. I would hope this is not an assumption that road closure is the optimum approach to conserving meadow resources. Meadow restoration will occur faster through active restoration efforts rather than passive long-term protection (Stevens and others 1991).

Commenter: 232

**Response:** We acknowledge your support for Alternative 4 as well as the desire to see restoration of closed routes included in that alternative. As indicated on page 22 of the FSEIS, an alternative which included closure and rehabilitation of some routes was considered but eliminated from detailed study since closure is beyond the scope of this analysis. The description of Alternative 4 has been modified in the FSEIS in response to your comments to include corrective actions for all routes that do not meet S&G #100. Please see page 20.

## Analysis

The TM DSEIS provides extensive hydrological analysis and a re-analysis of recreation; however, it does not provide a re-analysis of other resource areas, nor does it address compliance with the 2012 OHV Best Management Practices.

Commenter: 147

**Response:** As explained on page 1 of the TM FSEIS, this SEIS addresses only the additional information and analysis relative to the 42 specific routes, meadows, and Standard and Guideline #100 in the Eldorado NF. This document is tiered to the 2008 TM FEIS and ROD. A discussion of Best Management Practices has been added to the Hydrology section.

There is a lack of discussion in the TMDSEIS and the TM EIS (2008) on the amount of vehicle use a road will receive when it is open to public use during periods when the soils will be saturated, the time when rutting or other damage to meadow roads is most likely to occur.

Commenter: 147

**Response:** The amount of vehicle use is one of many factors that influences whether the Standard & Guideline #100 is met with regard to meadows. The evaluation criteria used to determine compliance with S&G #100, described in Table 3.5 of the FSEIS, reflects all of these factors. Alternatives 3, 4, and 5 are intended to bring routes into compliance with S&G #100, regardless of the amount of vehicle use.

The rationale for providing high elevation recreational opportunity to accommodate use displaced from the Caples Creek area should remain in effect as stated in the FEIS/ROD. This alone is sufficient justification for the non-significant Forest Plan Amendment that would leave high country routes such as 17E24 open to public motorized use.

Commenter: 199

The SEIS provides an inadequate range of alternatives. All action alternatives, with the exception of the Proposed Action would close over 90% of high elevation motorcycle trails. This would provide inadequate diversity of recreational opportunity to be consistent with the NFMA, the Travel Management Decision and the Forest Plan.

Commenter: 199

**Response:** The Forest acknowledges the importance of high elevation motor vehicle recreation opportunities. This is addressed in the public use section,

beginning on page 64. Alternatives 1 and 5 allow use immediately on these routes. Alternatives 3 and 4 propose corrective actions that would enable all or some of these routes to be opened.

Some route numbers have old (“N”) and new (“E”) designation numbers. To avoid confusion in the document, all routes with new should be listed with both the old and new designations at every point where they appear, and with a consistent old (new) or new(old) format.

Commenter 200,

**Response:** Route numbering is explained on page 3 and in Appendix A. To avoid potential confusion, the FSEIS has been modified to list routes that have been changed to trails with the trail number first, followed by the road number in parentheses. This same format is used on the maps.

NEPA requires alternatives to propose, plan and schedule actual specific mitigation work. NEPA regulation 1502.14 “Alternatives including the proposed action” states in paragraph (f) to:

“Include appropriate mitigation measures not already included in the proposed action or alternatives.”

For example, on Page iv of the Draft SEIS: “Mitigation would be proposed and analyzed as part of **future** NEPA analyses, as funding to implement corrective actions become available.” This is not acceptable. And on Page 9: “It would likely take a **number of years** for Alternatives 3 or 4 to result in all routes meeting S&G #100.” Also this is not acceptable, especially in terms of the length of time estimates.

Commenter: 200

The SEIS states that corrective measures were not analyzed, yet analysis of corrective actions is an essential part of S&G 100. A complete analysis needs to be completed to determine compliance with S&G 100.

Commenter: 201

**Response:** The analysis for the corrective actions would require additional engineering and design work. The Forest has developed a strategy to prioritize this work that is included in Appendix B of this document. In an effort to expedite the analysis and decision, the analysis for corrective actions will occur in subsequent decisions.

The EIS shall also include not only the loss of recreational values of the routes cited in the SDEIS, but also the potential loss of local economic activity, which includes:

**Loss of economic activity** at local businesses involved with public recreation, such as those associated with lodging, fuel, food and supplies, local and state and National Forest campground use.

Loss of consistent and/or renewed employment of federal and state officials (local law enforcement, Forest route planning and re-construction).

Commenter: 200

The economic and recreational values have not been analyzed in the SEIS for the El Dorado Forest Trails. The impact to the local business owners and local economy will be devastating if this route [Deer Valley Trail] is not reopened immediately.

Commenter: 201

The OHMVR is concerned that the OHV route closures could continue into the 2013 months. The economy of many northern California rural communities depends on the summer recreationists that visit the high value recreational OHV routes being affected by the closure. Many of the closed OHV routes have benefited from funding from the OHMVR Division Grants and Cooperative Agreements Program, a program contingent upon public motorized recreational access.

Commenter: 218

No analysis is offered as to the effects of leaving these trails closed for such an extended period of time. Before closing such historic routes, the effect on the user community, overflow to other recreational areas, economic effect on the local community, deterioration of routes and drainage/erosion due to lack of maintenance must be considered. It is clear that these standards are intended as guidance, to be used wisely and appropriately, not arbitrarily or absolutely, without other considerations.

Commenter: 229

**Response:** The socioeconomic analysis in the 2008 ENF TM FEIS recognized the importance of these routes to the local economy and did not need to be supplemented.

The court order was to amend the forest plan to allow these routes to cross meadows or to bring the 42 routes into compliance not just the 24 addressed in this SEIS. What changed? In the preferred alternative they are only reopening the trails which do not have meadows or that meet S&G 100. They have not identified with science why the 10 routes said to meet S and G #100 will be reopened or why the 18 high recreation value routes above 6,000 feet to not meet S and G #100. In other words the Forest has decided to skirt the whole court order by only partially addressing the order.

Commenter: 202

**Response:** As described in the Background section on pages 2 - 4, the Court order prohibited public wheeled motorized vehicle use on the 42 routes until such time as the Forest Service Completes an SEIS. Field surveys were conducted along the routes and a complete description of the definitions, methodology and meadow survey results are described on pages 37-49 of the FSEIS. The FSEIS does address all 42 routes as displayed in Tables 3.4 and 3.5, and on the four page Table 2.2, Comparison of Alternatives found on pages 24 - 27 .

Without further scientific study than what has been done the conclusion as to whether or not a road is adversely affecting the meadows health cannot be made.

The Forest's S& G #100 rule is meant for all roads and trails and not just specific to OHV routes, therefore the Forest should be considering all of the roads and trails in the Forest motorized and non-motorized and regardless of tread surface to assess their overall effect on meadow health. There are many paved roads within the Forest that intersect meadows and play a much larger role in meadow health than the 4.8 miles of roads that cross or border meadows within the 42 OHV routes in question. There are many more hiking trails which cross or border meadows which are not considered under this guideline.

Commenter: 202

We have noted that the Forest Service has omitted an important discussion in this analysis. **There is no "scale of effects" analysis.** That is, the affected land base is such a minute portion of Management Areas 28 (meadows) that the outcome of any alternative will be of negligible impact. However, the closures do interrupt the connectivity of the routes and/or deny public access to various natural amenities.

The Forest Service also omits any historical data. **We don't know how much these sites change over time.** The Forest service does not inform reviewers about how much or how rapidly they have changed, or if the sites have changed at all. It could be that the situation at many sites is completely static, that is, the effect occurred long ago and since that initial change there has been no further change. In this case, there is cumulative impact only because all the sites are added together. Then arises the difficulties of how small these sites actually are, and what the scale of the effects actually are--hence we need the scale of effects analysis. **Without a scale-of-effects analysis, a Decision to keep them closed is not legitimately well-reasoned.**

Commenter: 214

The DSEIS does not consider other uses that affect the Hydrology of the Meadows. There are other uses that can affect Hydrology of the Meadows, such as hiking, Mountain Bikes

and Cattle Grazing. If the trails are closed to motorized use the trails will still exist and the Hydrology will still be affected, this will do nothing to improve the meadows.

Commenter: 223

**Response:** As explained on page 1 of the TM FSEIS, this SEIS addresses the additional information and analysis relative to the 42 specific routes, meadows, and Standard and Guideline #100 in the Eldorado NF. This document is tiered to the 2008 TM FEIS and ROD. Analysis of other routes on the Forest is beyond the scope of this SEIS.

The closure of any of these 42 routes could displace this use into areas unsuitable or unauthorized for such activities. The virtual elimination of a high percentage of technical four-wheel-drive routes in the El Dorado for an unknown period of time is both counterintuitive and counterproductive to forest wide travel management. The proposed temporary restrictions in the preferred alternative would have negative impacts to the economies of the gateway communities of the El Dorado.

Commenter: 203

**Response:** A discussion of displaced use has been added to the Public Use section of this FSEIS. The socioeconomic analysis in the 2008 ENF TM FEIS recognized the importance of these routes to the local economy and did not need to be supplemented.

In many places in the DSEIS, the ENF mentions the high recreational value of the trails proposed for closure in the preferred alternative, yet there is no analysis to determine if the high value of those trails warrants leaving either some or all of those trails open while analysis and mitigation work is ongoing.

Commenter: 220

**Response:** Alternative 5 was developed based on public comments to amend the LRMP to designate the 18 routes that do not meet S&G #100 open while corrective actions are completed.

In the Forest Service's public meeting in Jackson, a strategy for developing a plan of corrective action for the 18 routes that do not meet S & G #100 was displayed. The strategy was limited to only two factors: the relative ease of corrective action and the level of recreational value. The Forest Service should also consider additional factors, including the potential ecological value of the meadow and its importance to habitat connectivity. Ecologically-based factors should also be given more weight than the factor of recreational value, as the routes are clearly not necessary to 'protect National Forest Service lands' given the damage done to meadows. The final SEIS should include

a revised plan which not only incorporates, but gives appropriate weight to ecologically-based factors.

Commenter: 221

**Response:** A modified version of the Strategy for Planning Corrective Actions for the 18 routes has been included in Appendix B. While it does not specifically incorporate a rating for ecological values of the meadows, it is assumed that all of the meadows are important. It is likely that work planning and available funding will play a greater role in scheduling of the planning for the corrective actions. The routes of greatest ecological concern have already been included in grant applications and are being built into the Forest Service program of work at this time.

The end result of the analysis in regards to compliance with S&G 100, (per the Forest's own definition of that guideline), is that the ENF failed to comply with two out of the four requirements of S&G100, therefore the Eldorado National Forest has failed to comply with the Purpose and Need as defined in both the Notice of Intent and the Draft Supplemental Environmental Impact Statement. Please remand this document and continue the analysis until compliance is achieved with all 4 actions required by S&G 100.

Commenter: 220

**Response:** The purpose and need for Action is stated on page 5 of this FSEIS. As described, the purpose of this analysis is to complete a SEIS to reconsider designation of the 42 routes and to determine whether public wheeled motor vehicle use will be allowed on the 42 routes. A range of alternatives was developed to address the Purpose and Need and significant issues brought forward by the public.

The attempt to provide public input was discouraged in the summary of comments from the scoping document for this SEIS. Forest response-- determining the legality of the "no meadow road" rule was outside this SEIS. As the Forest's rationale for the "no meadow road" rule appears flawed and there is no desire for discussion perhaps the public can appeal to the Region for clarification or their Congressional representatives.

Commenter: 232

**Response:** The Forest considered all public comments received during the scoping period. The comments and consideration are documented in the project record.

The SEIS analysis is improperly narrow in scope; it limits its hydrological analysis to a single RCO Standard and Guideline, then narrows that S&G to a single resource, meadows, while ignoring other known and potential impacts to wetlands and wildlife.

Commenter: 204

**Response:** The SEIS analysis is intentionally narrow in scope. As explained on page 1 of the TM FSEIS, this SEIS addresses the additional information and analysis relative to the 42 specific routes, meadows, and Standard and Guideline #100 in the Eldorado NF. This document is tiered to the 2008 TM FEIS and ROD which addressed impacts to wildlife and hydrologic resources.

Chapter 3 describes the environmental impacts of the proposed action and alternatives on Recreation and hydrology. In choosing to analyze recreation impacts, the DSEIS opens the door to analyzing more than hydrological impacts to meadows and cannot (and should not) attempt to close the door to analyzing impacts of these routes on other resources. Therefore, all impacts from the designated routes must be fully evaluated and disclosed to the public in order to comply with NEPA.

Commenter: 204

It is already documented that the trails proposed for prolonged closure in Alternative #3, the preferred alternative, are among the most highly enjoyed and valued trails in the Forest. To close these roads without completing the Demand Analysis sells the recreation community short by eliminating the information that would sway the balance between recreational and ecological needs more in their favor. Closure of these trails is arbitrary at best.

Commenter: 220

**Response:** As explained on page 1 of the TM FSEIS, this SEIS addresses only the additional information and analysis relative to the 42 specific routes, meadows, and Standard and Guideline #100 in the Eldorado NF. The recreation effects section has been modified in the FSEIS to reflect that it is a discussion only of public use of the 42 routes, not a full discussion of recreation impacts.

The DSEIS attempts to rely on an inadequate Cumulative Effects Analysis (CEA) in the TM EIS. The DSEIS refers to the reader to the March 2008 TM EIS for Cumulative Effects Analysis. However, it has already been demonstrated that the GIS data on which the earlier effects analysis was based on was incomplete and inaccurate; therefore, this SEIS cannot rely on that earlier analysis.

In addition to the mis-identification of meadows, the GIS data did not identify other impacts to riparian resources, such as sediment at stream crossings and roads in alder

wetlands, both of which violate BMPs in the Water Quality Management Handbook. These impacts must now be disclosed and analyzed in the SEIS.

Commenter: 204

**Response:** The only error the court found in relation to the 2008 EIS had to do with meadows. Field surveys were conducted in 2011 and 2012 in support of this SEIS. Analysis in the SEIS relies on the field surveys and not the GIS data. The meadow analysis relies on the field surveys and not the GIS data.

As explained on page 1 of the TM FSEIS, this SEIS addresses the additional information and analysis relative to the 42 specific routes, meadows, and Standard and Guideline #100 in the Eldorado NF. A complete discussion of other resources and effects, including cumulative effects is found in the 2008 EIS.

The SEIS must explain the discrepancies between the findings in the field surveys, as described in the draft Hydrology report (10-24-12) and the DSEIS.

Commenter: 204

**Response:** The draft Hydrology report referred to here was not yet complete. The completed report is included in the SEIS. There were two reasons the numbers changed slightly. The first is that we eliminated meadows on private land. The second is that several routes were reevaluated in the field during the summer of 2012 and the survey forms modified to reflect new findings to the existing conditions.

The DSEIS fails to consider impacts to meadows impacted by the roads that are not under FS ownership. The RCO #2, S&G 100 does not exclude meadows on non-federal lands through which Forest Service roads pass. Impact to non-Forest Service meadows should have also been included in the effects analysis and in the cumulative effects analysis.

Commenter: 204

**Response:** Forest Service Land and Resource Management Plan Standards and Guidelines apply only to National Forest System lands.

The DSEIS ignores violations of the 2012 Water Quality Management Handbook's Best Management Practices (BMPs) and fails to disclose, analyze or mitigate impacts to aquatic and riparian resources found by the 2012 monitoring surveys. Although an agency may have filed a final EIS, it is under "a continuing duty to gather and evaluate new information relevant to the environmental impact of its action. The Forest Service was provided extensive and detailed descriptions and photos of route conditions in November 2011. The Declaration and photos show clear violations of many RCOs and BMPs. The Forest Service may not ignore this evidence.

The protocol excluded important information about routes that were determined not to bisect meadows, even though there are obvious other problems with some of those routes, including violations of Best Management Practices, RCO Standards and Guidelines and the Endangered Species Act. CSNC has several times reported finding Yellow-legged frogs on one motorcycle route (17E28); rather than have the Forest's Fisheries of wildlife specialists do amphibian surveys to protocol, the Field Survey Form includes only "incidental sightings."

The DSEIS fails to analyze known site-specific impacts to riparian resources and wildlife. The original 2008 TM EIS was based on what the FS now admits were seriously flawed data. Site-specific information related to presence/absence of aquatic and aquatic-dependent species (eg fish and herpetofauna such as the Sierra Nevada yellow-legged frog that is listed by the State of California as threatened) was scant.

Commenter: 204

There are no environmental justifications provided for closing 18 trails that do not meet S&G 100, since the "Environmental Consequences" of each alternative is stated to be identical regardless of continued use of the trail.

Commenter: 229,

**Response:** The Forest Service reviewed the information provided and visited all of the 42 routes in the field in order to evaluate compliance with S & G #100. The SEIS evaluates compliance with S&G#100 and relevant BMP's for all of the alternatives.

The analysis contained in the FSEIS has been supplemented with information concerning the Yosemite toad and Sierra Nevada yellow-legged frog. In particular, information concerning surveys for both species and discussion of potential impacts by alternative,

The Forest Service limited their analysis based on the following court order: Case No.2: 09-CV-02523-LKK-JFM (*United States District Court, Eastern District of California* filed 7/31/12). The Court Order left intact all other portions of the Forest Service's travel management decision, including the parts of the routes that do not intersect meadows.

RCO #2, S&G 100 require the maintenance and restoration of streams, meadows and other special aquatic features, not only meadows. The DSEIS errs in ignoring these other aquatic features. For example, DSEIS figure 3.3 shows a water-covered road bisecting an alder-dominated wetland, which was not rated in terms of S&G 100. The road clearly violates the standard, yet this significant new information was completely ignored in the DSEIS, other than to explain why this route did not violate S&G 100 as it pertains to meadows.

The DSEIS must analyze and disclose impacts to each of these special resources and take corrective action to restore connectivity.

Commenter: 204

**Response:** As explained on page 1 of the TM FSEIS, this SEIS addresses the additional information and analysis relative to the 42 specific routes, meadows, and Standard and Guideline #100 in the Eldorado NF.

The Forest Service limited their analysis based on the following court order: Case No.2: 09-CV-02523-LKK-JFM (*United States District Court, Easter District of California filed 7/31/12*). The Court Order left intact all other portions of the Forest Service's travel management decision, including the parts of the routes that do not intersect meadows.

## Hydrology

The methodology for the hydrologic analysis conducted specifically for the TMDSEIS only assesses non-compliance with the Standard and Guideline 100; it does not assess compliance with that S&G. Specifically, the three criteria are based on visual assessments of water on routes and are incapable of determining the effect of compaction on subsurface water flow.

Commenter: 147

**Response:** The methodology does assess compliance with S&G 100 as described on pages 37 – 49 and in Tables 3.4 and 3.5 of the FSEIS. A consideration of subsurface water flow is included in the methodology as described in Table 3.5. This issue was previously raised during the scoping period and is discussed on page 9 of the FSEIS.

Since S&G100 does not separate hydrological connectivity in a meadow by types of recreation, to comply with that guideline, neither can the Forest differentiate. There must be an analysis conducted to determine why specific roads and trails were found to be out of compliance with S&G100 before the closure to motorized travel can be accepted as a remedy to that problem. Without that analysis, Alternative #3 can be determined to be both arbitrary and capricious.

Commenter: 220

**Response:** Standard & Guideline 100 does not distinguish between the different types of recreation that may or may not occur on roads and trails that are designated for public motorized vehicle use. The criteria for determining compliance with S&G #100, as described in Table 3.3 of the SEIS, does not distinguish between the different types of recreation that may or may not occur on roads and trails designated for public motorized vehicle use.

The SNFPA has two rules which govern the restoration of hydrologic function in meadows. Under RCO#5-Rule #117 addresses the hydrologic function of meadows with and without roads. Under RCO#2-Rule #100 addresses the hydrologic function of meadows with roads. Rule #100 covers only a subset of meadows that occur in Rule #117. The criterion of consistency for hydrologic function is written into Rule #117 as part of the SNFPA and should be the criteria of consistency for hydrologic function in Rule #100.

Commenter: 232

**Response:** Standard & Guideline #117 applies to range management analysis. Range management is beyond the scope of this SEIS. The scope of this SEIS is described in Chapter 1 of the document. Please refer to page 65 of the 2004 Sierra Nevada Forest Plan Amendment, Record of Decision for the complete text of Standard & Guideline #117.

## Impacts

I do not believe the study's conclusions are accurate. The DSEIS suggests that meadows are getting smaller is evidence of damage. I challenge that a meadow gets smaller naturally. Lake Tahoe will someday become a marsh, then a meadow, then a field and someday a forest. It is a naturally occurring transition. Just because a trail divides a meadow does not mean that damage is being done. "Although the water does not have connectedness" on the surface, it will find its way in to the same water table below surface.

I fear that conditions and findings may have been exaggerated and I would like to ask that an independent surveyor be used to review all the techniques and data collection regarding the 18 trails considered for mitigation. I would like to ask that every meadow on every trail be re-examined after a normal winter to see if they meet S&G 100.

Commenter: 17,

**Response:** Meadows do change over time both naturally and due to human impacts; some decrease in size while some increase. The criteria used in this analysis for determining consistency with S&G 100 are presented in Table 3.6. The Forest does recognize that 2011 was a fairly wet year. Many of the routes were re-evaluated during the summer of 2012 and the findings for a few meadows were changed.

Impacts to the PCT should be one of the criteria used when evaluating which routes should be open to motorized use. Unfortunately, where the DSEIS discusses issues raised during scoping, the document fails to detail impacts to the PCT, as an issue; conversely, closing part of route 14N39 is listed as a recreation issue in the DSEIS, even though this route negatively impacts the PCT. PCTA would like the ENF staff to consider the following routes further in regards to their impacts on the PCT: 14N39 and 17E16. 14N39 crosses the PCT which negatively impacts the trail. 17E16 connects directly with the PCT. Even though the last half mile of this route is closed to motorized use, PCTA strongly opposes this proposal.

Commenter: 68

Routes that approach anywhere near the Pacific Crest Trail should be kept closed to ORVs, because the wild character of the PCT is a special value of National Forests in the Sierra Nevada. This includes routes 19E01, 10N01B, 10N13, 17E16, 11N09A and 14N39.

Commenter: 183

**Response:** As explained on page 1 of the TM FSEIS, this SEIS only addresses the additional information and analysis relative to the 42 specific routes, meadows, and Standard and Guideline #100 in the Eldorado NF. Effects to the PCT are not analyzed in this document but were considered in the original 2008 TM FEIS.

Making 42.2 miles of “breaks” in known existing routes just is asking for lost/confused users to choose some alternate routes that would no doubt result in unintended damage to the rest of the area. Taking 2 to 10 years to come up with answers means that by 2015 or 2023 the area could/would be so crisscrossed with unintended routes and the damage would be extreme. I suggest the Forest Service get to the most important areas and clearly mark the best route or alternate through or around the sensitive areas.

Commenter: 137,

**Response:** Alternative 5 was developed based on public comments to amend the LRMP to designate the 18 routes that do not meet S&G #100 open while corrective actions are completed. Appendix B has been added to the FSEIS to display the Strategy for Planning for corrective actions.

My fear as a user of the Rubicon Trail over 45 years is that by continuing the closure on 18 of the 42 trails, particularly Barrett, Strawberry, and Blue Lakes/Deer Valley trails, the FS is forcing the 4WD community and users of the ENF to use the Rubicon Trail. This will create more usage, possibly more maintenance issues and with more people trying to share the same trail probably more law enforcement issues.

Commenter: 10, 223,

**Response:** A discussion of impacts from displaced traffic has been added to the FSEIS in the Indirect Effects to Public Motor Vehicle Use section on page 84.

Based on S&G100, there is no good legal or logical reasoning for keeping the 18 roads and trails closed until corrective action can occur, as it will take away much needed recreation dollars from primarily El Dorado County and also Amador County. The benefits of closing the roads and trails are outweighed by the high value of the recreation experiences and retail revenue associated with those roads and trails. Adopt a Trail clubs can begin to perform needed mitigation, while the Forest pursues more substantial funding sources. Ultimately, the public will turn to other Counties for recreation or increase traffic on existing trails, and there has been no analysis done on the economic loss to the Counties. The economic cost and the human recreation experience will be a greater loss than the cost to the natural features of trails that have been used for decades.

Commenter: 81, 198

The cumulative effects that the road or trail may have will continue, even though the route may be closed to public use if no corrective actions have been implemented during the closures. In any scenario, the Forest Service must take corrective action to bring the sites up to S&G100. Yet the affected sites are so small in proportion to the scope of the project and the scope of 2008 TMEIS that there can be no assurance any significant cumulative impacts will occur with or without the corrective actions. Further, there does not appear to be any such claim in the analysis. In fact, the Q&A document released with the SDEIS states that the reason for closing the routes is “because it reduces impacts to meadows”. This can not be true if S&G100 can not be met with simply a closure. S&G100 does not require closure, but rather asks that “corrective action be implemented”. Allow these 18 roads to remain open to public use while actively pursuing funding for corrective action. Actively recruit volunteers to begin immediate work to correct problem areas.

Commenter: 90

Based on S&G100, there is no good rationale for keeping the 18 roads and trails closed until corrective action can occur, because this burdens forest visitors with an “arbitrary and capricious” indefinite closure. It also will take away much needed recreation dollars from the Counties in and near ENF. The benefits of closing the roads and trails is outweighed by the high value of the recreation experiences and retail revenue associated with those roads and trails. Adopt a Trail clubs can begin to perform needed mitigation, while the Forest pursues more substantial funding sources. The burden on the public is also worsened because of the indirect effects of closing the roads and trails, that is, other roads and trails not affected by the Court order cannot be accessed except by using the closed roads and trails which could be closed by this EIS. This adds weight to the public's side of the equation; that is, the recreational and financial gains of keeping the roads and trails open while mitigation occurs, are greater than the cost to the natural features.

Commenter: 90, 214

No assessment has been made as to the rating of scale of work to be done on any particular location to bring any of the 18 roads or trails in to compliance with S&G100. Table 3.1 in the DSEIS rates the roads and trails on a scale of recreational value which I applaud and seems to be a step towards recognition of recreational value, but the response to the Court Order is what is at issue. These 18 roads and trails have locations identified as “not meeting” S&G100, but no analysis of the scale of work has been stated. Some of these locations could be remedied easier than others and could be “fast tracked” to completion negating any need for closure. Some areas may need more extensive work and may need further review. Some trails already have had work and planning done. Simply closing roads and trails is “arbitrary and capricious”.

Commenter: 90, 214

**Response:** Alternative 1 provides for the least amount of closures and restrictions. Alternative 5 was developed based on public comments to amend the LRMP to designate the 18 routes that do not meet S&G #100 open while corrective actions are completed. The Forest intends to continue working with a variety of user groups to maintain and improve routes across the Forest.

The analysis in the SEIS states public motorized use which has impacts to meadows, all though the impacts will continue regardless of use. The SEIS should, at a minimum, include an analysis of the relative impacts of routes open to public motorized use as opposed to routes that are closed to public motorized use. If this is not done the analysis would be inadequate to determine compliance with S&G 100. Therefore, all routes should remain open while mitigation is completed.

Commenter: 186

The SEIS should, at a minimum, include an analysis of the relative impacts of routes open to public motorized use as opposed to routes that are closed to public motorized use. If this is not done the analysis would be inadequate to determine compliance with S&G 100.

Commenter: 199

**Response:** This analysis has been completed and is included in the Hydrology section of the FSEIS. Alternative 5 was developed based on public comments to amend the LRMP to designate the 18 routes that do not meet S&G #100 open while corrective actions are completed.

I am writing to encourage the reopening of the existing OHV trails. The lack of off road tourists is having a very negative impact on the local businesses in the areas affected. I also think that as tax paying American citizens and green sticker and license carrying law abiding Californians we should not be subject to these closures as the trails are rightfully ours as it is? Please as an avid family off roader I am begging you to fully restore access to the trails.

Commenter: 191

The NEPA process requires a socio-economic assessment of EIS alternatives. Even if the Forests were not required to provide socio-economic analysis in a supplemental EIS the public requires it to make informed recommendations. A socio-economic analysis of the effect of each SEIS alternative was not provided.

Commenter: 232,

**Response:** As explained on page 1 of the TM FSEIS, this SEIS only addresses the additional information and analysis relative to the 42 specific routes, meadows, and Standard and Guideline #100 in the Eldorado NF. The socioeconomic effects were disclosed in the 2008 TM FEIS. All 42 routes are proposed to be designated for public motorized use under Alternatives 1, 3, and 5.

## Information

Please use facts and not radical green lies and hysteria in your decision making process. Consider the needs of the OHV community and their families. The OHV community, clubs and riders in general are great stewards of the Forest and will go out of their way to take care of any and all riding areas where they recreate.

Commenter: 20

**Response:** The FSEIS is based on current science and displays the effects of implementing a range of reasonable alternatives, consistent with the National Environmental Policy Act. The Forest intends to continue working with a variety of user groups to maintain and improve routes across the Forest.

Most of us OHV'rs are very much concerned about minimally impacting our surroundings and feel that many trail systems can be managed and maintained without too much external effort especially with the OHV funding available for such exploits.

Commenter: 24

**Response:** The Forest intends to continue working with a variety of user groups to maintain and improve routes across the Forest. However, some further analysis will be needed to identify the specific corrective actions for each route.

As groups of off roaders grow, the knowledge is spread to younger people to keep the trails, meadows, and surrounding areas clean. For years the 4 x 4 groups have done volunteer cleanup of all the areas in which we travel. I have never seen any group of people outside of 4WD clubs do any cleanup. This fact alone should be enough to stop trying to get rid of the off roaders that are always picking up after others.

Commenter: 31

**Response:** The Forest acknowledges the positive role user groups play in educating other users and maintaining various routes. The Forest intends to continue working with a variety of user groups to maintain and improve routes across the Forest.

I have worked in construction for 50 years and anytime you want to maintain the integrity of surrounding areas you raise the road and use bleeder mats under them. That alone would negate the closing of any road and it would be a lot cheaper than trying to return them to original state not counting the kudos you would get from the general public.

Commenter: 34

**Response:** The use of geotextiles is one technique that may be considered in the site specific analysis of corrective actions for each route.

It is easy to forget that these routes are RS-2477 and FLPMA protested rights of way that pre-existed the creation of the Eldorado and the Forest Service itself. Your agency has been tasked with managing public lands for all of the public, and it is not within the agency's power to take these rights of way. Only Congress can do so and Congress has already taken a 1/3 of the Eldorado away for everyone but hikers when they created Desolation and Mokolumne Wilderness.

Commenter: 38

All 18 routes are extremely unique, high in recreation value, some of these routes have existed over 100 years, and should be protected under the RS2477 rule.

Commenter: 216

The Draft SEIS acknowledges that many of the routes in question "have been in use for over a hundred years, being remnants of early emigrant trails over the Sierra Nevada." These routes must not be closed - temporary or otherwise - until it is determined if they are legitimate RS 2477 roads.

Commenter: 225

9N83 has been utilized for centuries, even before Alpine County was formed, to navigate the Sierra Nevada Mountains and is designated as an RS 2477 roadway.

Commenter: 197

**Response:** None of the 42 routes have RS 2477 status in that the involved counties have not asserted rights at this time

Many of these trails have been in use since the 1800's. (Pardoe is part of the Emigrant Trail). Deer Valley has been in use since the mid 1800's (1856 "Snowshoe Thompson", 1857 & 1858 Emigrant Trail) and was used by horses and wagons for many years to deliver mail. I find it hard to believe that these trails are now threatened and need to be closed either permanently or for more studies. These routes have been in existence for 160+ years.

Commenter: 49

**Response:** Although some of these routes have been used for many years, the Forest Service is responsible for considering the uses of NFS lands consistent with new laws, regulations and changing environmental conditions.

EPA also recommends that NEPA documents tiered to this SEIS include the results of comprehensive, up-to-date biological surveys of the Project area. Without such surveys, accurate evaluation of the environmental impacts of the proposed actions would be difficult. The tiered NEPA documents should thoroughly describe and evaluate appropriate corrective action alternatives.

Commenter: 141,

**Response:** All future analysis of corrective actions or other projects tiered to this FSEIS will comply with NEPA and other laws.

The Notice of Intent (NOI) proposed the use of a Land Resource Management Plan (LRMP) Amendment to enable routes that did not meet Standard & Guideline #100 to reopen, equivalent to Alternative #1 in the Draft Supplemental Environmental Impact Statement (DSEIS). However with the release of the DSEIS, a new alternative, Alternative #3, is presented as the preferred alternative which represents a marked change in direction. Alternative #3 precludes the use of the LRMP Amendment, and the only rationale used to explain this change is that Alternative #3 was developed in response to comments submitted by the public. In no place in the document are the comments that supported the use of a LRMP Amendment recognized or given equal consideration.

The ENF must pull its support for the Preferred Alternative, and must recognize all other public comments in an equal light, including CORVA's, which did not recommend a change in direction, and endorsed the Forest's initial plan to issue a LRMP Amendment. It is highly likely that a legal determination resulting from the propensity of those opposed to continued motorized recreational access of the Forest biases the agency towards closure-oriented alternatives. However this bias violates NEPA and harms the implied trust between the agency and the public it serves.

Commenter: 220,

**Response:** Alternatives were developed after scoping to address significant issues raised by the public. Alternative 3 was developed to address the concern that amending the LRMP would not resolve adverse effects to meadows. Each alternative, including Alternative 1, has been rigorously explored, objectively evaluated, and devoted substantial treatment as required by 40 CFR 1502.14. Alternative 3 was identified as the preferred alternative, yet a decision was not made. Comments concerning all of the alternatives were received during the 45-day comment period expressing support for each of the alternatives including Alternative 1 which is documented in Appendix E. The Forest Supervisor will consider the entire project record, including the response to comments, when determining which alternative will be chosen.

Standard and Guideline 100, which is vague and unscientific in nature, has been elevated through a quirk of process to a status of importance that trumps public access, recreational value, and economic and social impacts. This quirk of process brings Standard and Guideline 100 to discussion as it relates to motor vehicle use, but Standard and Guideline 100 does not specify user groups of one type or another. If the ENF uses temporary or permanent closures to address Standard and Guideline 100 during the 42 Routes Project, it will set the precedent to use closures in future processes, regardless of user groups affected. In order to prevent closures to other user groups during future processes, the ENF needs to create a SEIS that plans mitigation for specific portions of routes that do not meet Standard and Guideline 100, and that maximizes the mileage of routes that will remain open throughout the process.

Commenter: 225

**Response:** The FSEIS analyzes 5 alternatives, including Alternative 1, which amends the LRMP to exempt the 24 routes from meeting S&G 100. The 4 action alternatives identify different ways of complying with the ENF LRMP, none of which are precedent setting actions for future analysis.

Consideration *must* be taken as the “sections” identified within the suit on specific routes, for the intended purpose of COMPLETE closures, yet with very small section identified to be closed, thus breaking a complete route to the next destination or road junction. Review the Field Survey for Meadows and Roads identified in the SDEIS and listed on the website, specifically route 16E21 series, as many surveys were listed by 16E21- (??) and identified as N/A –Not a Meadow in July and August 2011.

Commenter: 228

**Response:** The field surveys were reviewed, including route 16E21, and it was determined the appropriate portions of routes are closed as required by court order.

The court has not presupposed, prescribed, or in any way implied expectations as to the resulting decisions to be made in the SEIS other than to mandate “Analysis for RCO#2 Standards and Guidelines #100 pertaining to the meadows on the 42 routes listed in Table A.” There is no order mandating conformance.

The court order closing 42 routes circumvented NEPA law as would be required if the Agency had chosen the closures, and has been largely seen by the public as a punitive action by the court. As clearly stated in the Order, this is a temporary closure that expires once the required SEIS is completed. While this may have been an appropriate decision within the context of this legal action, as an environmental action it is strictly arbitrary.

Commenter: 229

**Response:** We agree the court has not presupposed, prescribed, or in any way implied expectations to the resulting decisions to be made in the SEIS. The SEIS is required to be consistent with the LRMP, which could mean amending the LRMP or taking a different action to provide for consistency with the LRMP. The order will be finalized when the SEIS is completed and submitted to the court. The SEIS is not complete until all appeals of the decision have been responded to and the decision has been affirmed.

## Meadows

14N58 is not a meadow (it ends at a stand of timber). Meadows shown on the maps could be used as a tool to restrict access in the future. Meadows mapped on private lands shouldn't show on the current Forest Order. Some of the meadows identified by the Forest Service are not meadows (McKinstry). Still have non-meadows mapped as meadows and this could become a problem later down the road.

Commenter: 66

**Response:** As described on page 3 of the TM FSEIS, the Forest recognizes that some of the features that were originally mapped in the Geographic Information System (GIS) database as meadows are not actually meadows. As explained on page 4 of the TM FSEIS, each of the features mapped as meadows that cross the 42 routes were examined in the field and evaluated for consistency with S&G 100. Only meadows located on National Forest System lands were included in the analysis. Of the two features encountered along 14N58, one is considered to be a meadow that is consistent with S&G 100 and one feature is not a meadow (see page 7 of Volume 2 Maps for the location of the two features). Many of the routes were re-evaluated during the summer of 2012 and the findings for a few meadows were changed.

Meadows that are still in existence after many years of motorized and wheeled travel (more than 100 years in some cases) are clearly capable of sustained vehicle use, and it is unlikely that continued use will result in "impacts to hydrology, natural vegetation, and wildlife habitat". The Forest has provided no analysis or studies to support this conclusion, and this change of direction ignores the many comments made in support of an LRMP amendment to allow travel without recognizing or giving equal consideration to those comments.

Commenter: 81, 196

**Response:** The adverse effects of roads and trails on meadows and other aquatic features have been well established in scientific literature as described in the 2008 TM FEIS. This FSEIS documents the effects of 42 routes on meadows with regard to S&G #100 as described in the Hydrology section of the FSEIS. Alternative 5 was developed based on public comments to amend the LRMP to designate the 18 routes that do not meet S&G #100 open while corrective actions are completed.

The SEIS needs to conduct an analysis by meadow to determine if road closure is a necessary corrective action.

Commenter: 197

**Response:** This SEIS analyzes meadows to determine whether to allow public motorized use on the 42 routes in light of S&G #100. The effects analysis by meadow is presented in the Hydrology section.

From the description in the field survey it appears that there may be no relationship between trail 17E28 and the drying of the upper section of the meadow. Unless there is clear evidence of the trail affecting the meadow 17E28 should be added to the list of trails that meet S&G 100 and RCO #2.

Commenter: 199,

**Response:** The field survey form for meadow 17E28-7 describes the degraded condition of the meadow, but does not make it clear why the trail is causing the meadow to not meet S&G #100. The reasons will be evaluated in more detail during site specific NEPA analysis for corrective actions.

If we are to find significant adverse roading impacts to the total meadow acreage the effects must be found in the meadow proper not the road ways themselves. This will prove difficult because other factors than roads are the usual cause of extensive meadow degradation.

Commenter: 232,

**Response:** In order to determine that a meadow is not in compliance with S&G #100, there must be visible evidence that the road or trail is a major cause of the meadow not meeting S&G #100. This is reflected in the field survey forms used to evaluate compliance with S&G #100 and in Table 3.5 of the Final SEIS.

Contend that if meadow hydrology is in such dire shape Forest –wide as to require absolutely no roads then the causal agent for meadow degradation is not roading.

The conservation of the meadow resource is much more likely to depend on what we do with the roaded meadow access into adjacent forest lands for fuel reduction, tree density reduction, and extensive fire prevention-control than what we do with the road in the meadow.

Commenter: 232,

**Response:** There are many land disturbances that can cause or contribute to the degradation of a meadow, and there a number of types of degradation that can occur in a meadow. Standard & Guideline #100 focuses on roads and trails as they affect the hydrologic connectivity of the meadow – this was the focus of the field survey forms and the analysis in the Final SEIS in order to meet the

requirements of the following Court Order: Case No. 2:09-CV-02523-LKK-JFM (United States District Court, Eastern District of California, filed 7/31/12)..

In the Forest road survey the presence of erosion, sediment transport, rill and gully presence, stream incision and loss of channel –flood plain connectivity were used as the basis for determining which roads would remain closed and which would be opened. I contend these geomorphic attributes will correctly ascertain if the hydrologic connectivity of the meadow is impacted, but that their presence on roaded meadows is not *a priori* evidence of roading impacts.

“Natural erosion and sediment deposition processes are essential to maintain stable banks, healthy substrate, quality aquatic habitat and cover, and positive and functional hydraulic circulation” (Borgmann et al. 2011-page 10).

Without current and historical information on meadow and side slope perturbations is unlikely to determine if these natural geomorphic processes are related to the presence of roads or other factors.

Without paired study comparison between adjacent roaded and un-roaded meadows it will be difficult to separate out roading impacts on hydrological connectivity.

Commenter: 232

**Response:** The methodology for the field surveys that determined compliance with S&G #100 is described in detail in Table 3.6 of the FEIS. It is acknowledged in Table 3.6 that the questions in the field survey form are qualitative, require hydrologic knowledge and field experience to answer, and are based on features that are visible at the ground surface.

In field application Rule #100 in the Forest road survey provides too many false positive indications of adverse roading impacts. All roads and trails intercept surface flow regardless if these are adverse impacts and there is a good deal of ambiguity in determining road disruption of sub-surface flow and its hydrologic significance.

The disruption of sub-surface flow by the road surface would be fairly difficult to assess along the length of the meadow road; in fact I don't know of a single study that has documented this quantitatively.

Commenter: 232

**Response:** Roads and trails were rated as meeting Standard & Guideline #100 unless clear field evidence indicated otherwise. As a result, many meadows were rated as meeting S&G despite the fact that degradation of those meadows was obvious. The criteria for rating a meadow as not meeting S&G #100 is described in detail in Table 3.6 of the FSEIS. It is acknowledged in Table 3.6 that roads

and trails intercept surface and subsurface water, and that hydrologic knowledge and field experience is necessary in order to answer the questions on the field survey form and determine compliance with S&G#100. The field survey form was developed because there was no existing survey form that specifically determined compliance with S&G #100.

The SEIS criteria used to determine meadow failure of S&G (Rule) #100 (Table 3.8 page 36) are scientifically appropriate, but quantitatively and qualitatively difficult to determine under field conditions.

The threshold criteria for each reason number to determine sufficient adverse effects to declared road failure to Rule #100 was decrease in meadow size or wetness”; neither factor was measured quantitatively in the field and qualitative estimates of changes in size and wetness cannot be separated from drought, grazing or climate induced reduced meadow inflows. As a result the reported failure of the Route segment or portions of Route segments is invalid.

Commenter: 232

**Response:** The methodology for the field surveys that determined compliance with S&G #100 is described in detail in Table 3.6 of the FEIS. It is acknowledged in Table 3.6 that the questions are qualitative, require hydrologic knowledge and field experience to answer, and are based on features that are visible at the ground surface. In order to determine that a meadow is not in compliance with S&G #100, there must be visible evidence that the road or trail is a major cause of the meadow not meeting S&G #100. This is reflected in the field survey forms used to evaluate compliance with S&G #100 and in Table 3.6 of the Final SEIS.

## Miscellaneous

Please let us ride and support local cities.

Commenter: 21,

**Response:** The 2008 TM FEIS discussed the socioeconomic effects of recreation on the Eldorado NF. As explained on page 1 of the TM FSEIS, this SEIS addresses the additional information and analysis relative to the 42 specific routes, meadows, and Standard and Guideline #100 in the Eldorado NF

Our parents started visiting the area in about 1920. We have continued this enjoyment up till now. As far as we can see, very little has changed from people using the area. Damage has been minimal. Mother Nature has changed things in her own way----fire, slides and erosion. Because of this observation over the years, we see no reasons to restrict the use of the roads in the area. This is especially true in the Strawberry (hi way 50) area. This is our backyard from our cabin in Strawberry Meadows. We would like people to enjoy the area as our family has for the last 60 years.

Commenter: 42,

**Response:** Pages 3 through 5 of the TM FSEIS explain the reasons that the routes are closed until this analysis is completed.

Many, if not ALL, of these trails have been in existence in excess of a hundred years and the meadows have clearly done well over that time. It would be nothing less than excessive to keep the trails "CLOSED" for years while the "necessary repairs" are completed. Perhaps, the specific locations on the trail that are "sensitive" could be clearly MARKED so users could tread with even greater caution in these areas.

Commenter: 46,

**Response:** This appears to be a proposal to open routes while marking meadows as sensitive areas. However, the existing physical condition of some routes and their location within meadows leads to the finding of not complying with S&G 100. Marking the meadows as sensitive will not result in the meadow meeting S&G 100.

Some of these alternatives significantly modify a court order of extreme environmental ideology. However, I am not satisfied with any of them. No routes, except for rare exceptions, should have been closed. Given our population growth and the growing need of outdoor experience for urban people, the Forest Service should be expanding, not reducing, use of the National Forests. None of what I've said, however, is meant to preclude improvements or changes in a probably small number of very destructive road

situations. I would prefer the Forest Service to devote itself to fixing those very few situations and expanding, not restricting, forest use.

Commenter: 47

**Response:** Pages 3 through 5 of the TM FSEIS explain the reasons that the routes are closed until this analysis is completed. Alternative 1 allows public use of all 42 routes. Alternatives 3 and 4 recognize the need for corrective actions. Site specific analyses for corrective actions will be completed at a future date.

If cohesive and accurate studies are conducted and a responsible plan of action is put in place I personally will give my time and money to make improvements to keep these historic and beautiful trails open. What I cannot understand is using inaccurate and misleading information to close them completely.

Commenter: 49

**Response:** Pages 3 through 5 of the TM FSEIS explain the reasons that the routes are closed until this analysis is completed. The Forest intends to continue working with a variety of user groups to maintain and improve routes across the forest including the implementation of corrective actions on these routes.

I am writing with hopes that you will reconsider open the closed routes and not close other routes. As an avid 4 wheeler these trails are beautiful, historic and scenic and to see them close is sad. The people that vandalize these trails and ruin the history are not people like me or my friends that enjoy the outdoors. They are people that don't belong in these areas and have no consideration and respect for previous generations.

Commenter: 50

**Response:** Pages 11-21 of the TM FSEIS describe each of the alternatives considered in this analysis. Alternative 1 allows public use of all 42 routes. Alternatives 3 and 4 will open routes following corrective actions. No alternatives propose to close any additional routes.

One concern we have is the lack of enforcement of the current 42 road closures. We understand that not one of these closed roads has been assigned to your law enforcement personnel to patrol. If the road closures are not enforced, you might as well open these roads to everyone. The very act of ignoring enforcement of the closed roads makes this entire DSEIS somewhat farcical. We highly recommend that you instruct your law enforcement personnel to patrol these closed roads on the days when most off-road action takes place. If you combine enforcement, as the court certainly implied to comply with its order, then Alternative 3 should sustain these meadows until the requisite repairs have been completed.

Commenter: 64

**Response:** The Forest has a responsibility for patrols and enforcement in all areas across the Forest and has been actively patrolling the 42 routes involved in this analysis, along with other routes. As explained on page 1 of the TM FSEIS, this SEIS addresses only the additional information and analysis relative to the 42 specific routes, meadows, and Standard and Guideline #100 in the Eldorado NF.

I realize funding for all types of repairs and mitigation is always an issue – especially with the upcoming impact of the budget sequester. However, I believe the Forest Service will find a willing partner in the off road community.

Commenter: 67

**Response:** The Forest recognizes the contribution of user groups and individuals and intends to continue working with a variety of user groups to maintain and improve routes across the Forest including the implementation of corrective actions on these routes.

The court order does not require the FS to close any trails once the SEIS is complete.

Commenter: 10

**Response:** You are correct.

When the DSEIS was released, a new alternative was introduced and identified as the preferred alternative which represents a marked change from the NOI proposal. The only rationale presented by the Forest for this extreme change was in response to comments made by the public that states that, "Amending the LRMP to allow continued public motorized use in sensitive meadow habitats will result in impacts to hydrology, natural vegetation, and wildlife habitat". I believe that this statement is in error because the SDEIS also clearly states that many of the routes slated for closure are public roads that have been in place for many years, some since before the existence of the Forest.

Commenter: 81

**Response:** As explained on pages 8-10 of the FSEIS, alternatives are developed from public comments received during scoping. Alternative 3 was developed to address issue statement #2 (page 10 of the FSEIS).

Judge Karlton's order to the ENF was to perform a NEPA analysis and that is what the Forest should do. The Forest must pull its support for route closures and recognize the comments of RTF and others made to the NOI (based on the proposed action, not on an unanticipated direction) and issue the LRMP amendment.

Commenter: 81

**Response:** The process the Forest is following conforms to regulations implementing NEPA. All public comments are considered during the analysis and decision process. Two alternatives include amending the LRMP.

The S&G was adopted for all new activities. Driving on these roads is not a new activity. In most cases it is a very, very old activity. Some roads date back to the stage coach days. One is a section of the old Highway 88. Another is part of the main immigrant trail to California blazed by Kit Carson, constructed by Mormon pioneers in 1848 and used by thousands during the gold rush. Another is the wagon road to Calaveras Big Trees. We question the need for an amendment to the LRMP given the historic nature and use of these roads.

Commenter: 101

The S&G was adopted for all new activities. Driving on these roads is not a new activity.

Commenter: 197

**Response:** Page 4 of the FSEIS gives the background on rationale for application of S&G #100 when designating routes for public motorized use. Designation of routes in the 2008 TM FEIS was considered a new activity.

If remediation is deemed the only way to maintain access allowed by the 2008 FEIS/ROD then grant funding should be pursued in a creative manner from traditional and non-traditional sources as should labor resources.

Commenter: 167

**Response:** The Forest will continue to work with partners and volunteers, and continue to seek funding opportunities through grants and other sources.

The highest recreation value was placed on almost all the trails proposed for closure. The Forest Service is supposed to balance the recreation experience, as well with other needs, including ecological. Does closing all the high recreational value trails balance the needs of the of road community with the ecological needs? Could the Forest Service have come up with an alternative that allowed for necessary mitigation plans using volunteer labor on some of the high recreational value trails? Hence keeping all trails open while mitigation is completed.

Commenter: 186

**Response:** Alternative 5 was developed based on public comments to amend the LRMP to designate the 18 routes that do not meet S&G #100 open while corrective actions are completed.

The analysis in the SEIS is inadequate because it fails to identify corrective actions that can be implemented other than closure of routes to public motorized use.

Commenter: 199,

**Response:** The discussion in the hydrology section under Alternative 3 (page 54 of the FSEIS) includes a list of possible corrective actions to be used, but does not determine the specific actions by route.

We note the Forest Service has yet to inform the public as to under what rule this Decision will be made, and whether it is subject to Appeal or the Objection process.

Commenter: 204

**Response:** This decision will be subject to 36 CFR 215.

## Mitigation

Let's take the time to fix the issues at hand so we can keep these areas open for good. I for one, as many others, would love to help in any way the Forest Service needs it, labor material, etc.

Commenter: 74

**Response:** The Forest intends to continue working with a variety of user groups to maintain and improve routes across the Forest including the implementation of corrective actions on these routes.

This lack of proposed timeline for performing mitigation, and lack of specific details as to the order in which the trails might be mitigated and re-opened makes it difficult to discern exactly what the long term plan is. The Forest should include an analysis of long and short term planning and mitigation efforts.

Commenter: 81

The Forest Service needs to outline detailed projects and timetables to allow resumption of access on these routes. NOT just as funds become available. Without detailed budgets the money will be allocated to other project and law enforcement. The routes will then have no hope of opening again.

Commenter: 230

I feel it is the Forest Service responsibility to provide reasonable and accountable timelines for implementation and completion as well as prioritization of projects leading to the reopening of these affected routes.

Commenter: 40

What I would like to have brought to discussion is what can be done to get the roads into use in a timelier manner. If certain areas had priority (09N82, 09N28, 09N82 and the areas 17E24-3, 3, and 5) over the other fixes this would open up the road from Mud Lake staging area to the ridge first to open the most and then do the rest. I am handicapped and can't walk long distances, but I can ride a quad to Martel Flats on Squaw Ridge and walk to a nearby alpine lake.

Commenter: 29

I stress the importance that the Forest service prioritize its programs so the high-value "alpine" routes are first to receive mitigation measure with a goal to reopen them.

Commenter: 230

**Response:** The Forest is already actively seeking funding to complete the analysis for the corrective actions on the affected routes; however, the alternatives in the TM SEIS do not identify the order or timeline in which corrective actions would be taken. Appendix B has been added to the FSEIS to display the Strategy for Planning for routes requiring corrective actions. The timing and implementation of corrective actions will depend on the availability of resources.

The SEIS should also suggest some appropriate temporary mitigation measures it will consider on an individual meadow by meadow basis. For example, where use does impact water flow, consider mitigation measures that can be implemented until corrective actions can be completed such as wet-road restrictions. As two commenters to the scoping document requested, there should be some discussion about how much vehicular use a road will receive when soils are saturated; the time when rutting or other damage to meadow roads is most likely to occur. Thirty-three of the thirty-eight meadows are affected by run-off from the roads. Consider listing some standard control devices that can be employed for temporary relief, such as rip-rap, erosion matting, and water bars.

Commenter: 101, 197

**Response:** The discussion in the hydrology section under Alternative 3 (page 54 of the FSEIS) includes a list of possible corrective actions to be used, but does not determine the specific actions by route.

## Monitoring

There is no discussion in the TMDSEIS regarding future monitoring of the 42 routes through meadows. Similarly, there is no discussion in the TM DSEIS regarding adaptive management.

Commenter: 147

**Response:** As explained on page 1 of the TMFSEIS, this document is tiered to the 2008 TM FEIS and ROD. All discussion of monitoring of meadows is included in the 2008 FEIS on page 2-19 and 2008 ROD (page xx) which state that meadow monitoring will commence within 2 years of implementation of the decision. The meadow monitoring was initiated in 2009 and the field surveys conducted for this analysis are a continuation of the monitoring. This TM SEIS does not propose adaptive management, but rather identifies locations where corrective actions are needed. Alternatives 3, 4, and 5 provide for further site-specific analysis before routes are open for public motor vehicle use.

## New Information

The DSEIS also fails to adequately analyze compliance with the 2012 [Dec 5, 2011] Water Quality handbook Best Management Practices. The Forest Service updated its Water Quality Management Handbook in 2012, including the addition of BMP's for off-road vehicles. The 2008 TM EIS was not subject to those, but this supplemental EIS must review these 42 routes for compliance with applicable BMP's, including: BMP 2.1 (Travel Planning), BMP 4.7.1 (Planning) and BMP 4.7.2 (Location and Design).

Commenter: 204

**Response:** BMP 4.7.1 has been addressed in the Effects section for Hydrology in the DSEIS and in the FSEIS (page 51.) A discussion of BMP 2.1 and BMP 4.7.2 has been added to the FSEIS on page 52.

The DSEIS narrowly addresses BMP 4.7.1, item #3 a-b, and only with regard to meadows, despite the BMP's clear intent to also include Streamside Management Zones (SMZs) and riparian areas.

Commenter: 204

**Response:** As explained on page 1 of the TM FSEIS, this SEIS addresses the additional information and analysis relative to the 42 specific routes, meadows, and Standard and Guideline #100 in the Eldorado NF. For a discussion of other resources and effects, readers should review the MNFEIS & ROD, March 2008.

## Proposed Alternatives

Keep trails open: add the mitigation issues and proposed actions and maybe add a deadline date for completion.

Commenter: 10,

The meadow routes should remain open in a “modified preferred alternative” because those routes are an integral part of the minimally functional network of motorized trails proposed for designation in the 2008 FEIS/ROD. Additionally, public access to our mountain trail should remain open for all to enjoy.

Commenter: 38, 41,

I would strongly urge you to keep the 42 subject trails in Eldorado open to public travel. These back country trails offer families a chance to get off the beaten path and have a sense of the great outdoors that cannot be found on the main roads. If there are areas of concern please consider a plan that will keep the trails open until such time as the trails can be altered to eliminate any negative environmental impact. Many of these trails have been in use for generations, surely a few more seasons won't cause any substantial further impact.

Commenter: 59,

I am really disappointed in Alternative 3. I believe a better plan would be to open the trails then work on the mitigation through the year with volunteers doing the work. Most of these trails have been open and used for up to 50 to 100 years. The environmental problems will not get worse in a year or two while we all work to mitigate the problems.

Commenter: 10,

Meadow routes should remain open in a “Modified Preferred Alternative” because the routes were originally designated by the original Travel Management decision approved in 2008.

Commenters: 35, 36, 37, 38, 39, 40, 41, 43, 45, 47, 48, 49, 51, 52, 69, 70, 71, 72, 73, 74, 76, 82, 83, 85, 93,

Meadow routes should remain open in a “Modified Preferred Alternative”. Conditionally designate the trails open once a new interim wet weather/seasonal closure plan is adopted.

Commenter: 71

It makes sense to study any impact to these routes but keep them open while conducting the studies.

Commenter: 49

The forests have not been destroyed, species have not gone extinct and the damage is over stated. Please allow the trails to remain open while the meadows are being repaired. This would allow easier access to the meadows for survey, planning and repair. If the routes are closed for years it would lead to overgrowth and other issues and become more problematic. Continued use will allow users to maintain the routes.

Commenter: 17

Allow these roads and trails to remain open to public use while actively pursuing funding for any needed corrective action. Actively recruit and utilize existing volunteers to begin immediate work to correct problem areas. Volunteers have been used with great success on the Rubicon for years all you have to do is ask. It seems like the Forest Service is always trying to protect themselves from lawsuits you have to realize that no matter what you do someone will sue, please think of the thousands of people who in a sense own that land that you are managing who recreate out there vs the few that want it closed down to everyone.

Commenter: 81

While Alternative 1 proposes keeping all the trails open, the ENF has failed to provide an alternative that provides for keeping all the 42 trails open while undertaking the planning and mitigation process to comply with S&G 100. Such an alternative would be a compromise that might satisfy the traveling public and reasonable environmental concerns. No analysis of cumulative environmental damage has been undertaken by the ENF, and there is no science to support that continuing travel during planning and mitigation would cause such damage.

Commenter: 196

According to the analysis of the 42 routes there were 18 routes “found by USFS does not meet Standard & Guideline #100.” These 18 routes should be reopened and continued for motorized access under Forest Plan Amendment, or Categorical Exemptions. Routes must remain in NFTS system for tracking and future issues of Motor Vehicle Use Map. Routes could be “conditional designated” with corrective measures to be worked on in the future, while allowing routes to be reopened to motorized access. The Court order does not require these routes remain closed to motorized. Routes have been analyzed. All 18 routes should be reopened as soon as this process allows.

Commenter: 216

The SEIS states that mitigation needs to be completed; there is no detailed outline for how the mitigation will be completed. The routes need to remain open while mitigation is completed. Volunteers from the OHV community have spent thousands of hours annually mitigating this trail annually.

Commenter: 201

**Response:** Alternative 5 was developed based on public comments to amend the LRMP to designate the 18 routes that do not meet S&G #100 open while corrective actions are completed. The Forest recognizes the contribution of user groups and individuals and intends to continue working with a variety of user groups to maintain and improve routes across the Forest including the implementation of corrective actions on these routes.

The condition and proximity of several routes relative to aquatic features indicate that it will take considerable effort to bring the routes into compliance with S&G 100 and that for all practical purposes, the routes should be removed from the National Forest Transportation System if further study indicates that bringing them into compliance with S&Gs is not feasible. Mitigative actions should be taken to minimize the present degraded condition.

Commenter: 147

**Response:** The proposal to remove the routes completely from the NFTS is beyond the scope of this project. The Purpose and Need for Action, as stated on page 5 of the FSEIS is to determine whether public wheeled motor vehicle use will be allowed. Permanent closure and removal of the routes is beyond the scope of this analysis. As suggested by the commenter, future analyses will address corrective actions needed.

We urge you to refine an alternative that falls within Alternatives I, 2 and 3. Such an alternative would release the 24 roads that either do not affect meadows or are found in compliance with S&G #100. For the 18 roads not found in compliance, provide a preliminary assessment for the necessity of corrective actions, and where necessary, establish a plan for the development of corrective actions, the implementation of which will provide compliance with S&G #100. Include an evaluation of the necessity for temporary mitigation measures.

Commenter: 101

**Response:** We have modified Alternative 3 and created Alternative 5 based on public comments. The full descriptions of these alternatives are included in Chapter 2 of the FSEIS.

We would like to see a modified preferred alternative presented allowing continued unfettered access to all of the routes in question while also possibly incorporating plans and provisions for corrective actions to be taken where necessary to restore hydrologic connectivity. The nineteen meadow routes found inconsistent with Standard and Guideline 100 should remain open in their entirety while the more extensive process of evaluating each individual route and identifying specific remediation solutions is undertaken. Specific areas on the ground not meeting S&G 100 should be signed as such and a temporary solution arrived upon to minimize further damage while leaving the entire route open for motorized use until such time as permanent remediation efforts can be undertaken if deemed practical. If a specific area of a meadow not meeting S&G 100 would benefit from a wet weather or seasonal closure, while leaving the rest of the route open in its entirety, that may be an acceptable temporary solution, depending upon implementation.

Commenter: 167

**Response:** Alternative 5 was developed based on public comments to amend the LRMP to designate the 18 routes that do not meet S&G #100 open while corrective actions are completed. We considered an additional alternative that would incorporate a wet weather closure on some routes. The alternative was eliminated from detailed study because many of the high elevation and high recreation value routes with impacted meadows would remain closed since the meadows remain wet the entire season.

To maintain consistency with the FEIS/ROD the SEIS should include a modified alternative that would allow the original non-significant Forest Plan amendments to stand and the related 20 routes to remain open to public motorized use.

Commenter 199,

**Response:** A short history of the original decision and court order is included in the Background Section of the SEIS on pages 2 -4. This section explains why the original decision needed to be reconsidered by preparing a Supplemental EIS. Alternatives 1 and 5 of this SEIS include Forest Plan amendments for all of the routes not meeting Standard and Guideline #100.

## Public Use

ENF is public land for public multiple use, and as such, every road and trail that has been open for travel. Any roads closed to travel, should be re-opened to travel. If there are areas of concern, they should be handled by the rangers and tickets issued instead of simply eliminating public use to make it easier for you.

Commenter: 1,

**Response:** Pages 3 through 5 of the TM FSEIS explain the reasons that the routes are closed until this analysis is completed. The reasons that some of the routes do not meet S&G 100 are described in Table 3.6 of the TM FSEIS. For some of the routes that do not meet S&G 100, corrective actions to the routes themselves are necessary in order to comply with that S&G. This would not be accomplished by simply issuing tickets.

I think off road vehicle travel and roads should be concentrated in particular areas where they already are, and not spread into areas where they are not. Mechanized use of public lands is disruptive and annoying to other classes of users, to wildlife and to plants. Mechanized use is one major aspect that makes multiple use lands decidedly less attractive to hikers than wilderness or Park Service land. I would try to concentrate mechanized use, i.e. roads, and all types of off road vehicle use, to keep this use from spreading and degrading other public lands. Mechanized use, in my opinion, degrades public lands to the lowest common denominator. My advice and opinion: keep this kind of use minimized and concentrated. Once this type of use gains access to nicer, more pristine areas, those areas will no longer be nice in terms of at least having some degree of wilderness, preservation value.

Commenter: 4,

**Response:** The 2008 Travel Management decision included restricting motor vehicle travel to a system of designated routes and prohibited “cross country” travel. The 42 routes under consideration in this SEIS were already in existence prior to the 2008 decision and were only closed recently by Federal Court Order. All of the routes are located within areas identified in the ENF LRMP as managed for motor vehicle use.

As an active outdoor enthusiast I want to see all of our lands protected for the future generations and to maintain a clean and healthy habitat. However, I do not want all access limited and not allow for the persons who do drive 4 wheel drive vehicles properly to lose their ability to enjoy the sport and access areas. I understand that damage has been done to many areas around the popular 4 wheel drive trails, but the damage is usually caused by a small number of people who do not adhere to the rules.

In lieu of closing trails, I would rather propose a stewardship and/or permitting requirements for those clubs who are willing to work and help maintain specific OHV trails. Persons identified 'off trail' or 'damaging land' should have photos or have identifying information submitted to the El Dorado County Sheriff for referral and have their specific access to these areas revoked. Therefore, if someone who has had access revoked is found to be on any one of the trail systems their vehicle is subject to impounding fees. This is an undertaking, however requiring permitting would also cover some of the fees required. Additionally, once a vehicle is impounded then all fees would go to that enforcement office. This would happen a few times a year, and eventually less of it will happen because of the high fees associated with the consequences.

Commenter: 5,

**Response:** Pages 3 through 5 of the TM FSEIS explain the reasons that the routes are closed until this analysis is completed. The reasons that some of the routes do not meet S&G 100 are described in Table 3.6 of the TM FSEIS. For some of the routes that do not meet S&G 100, corrective actions to the routes themselves are necessary in order to comply with that S&G. Revising the process of enforcing forest rules or fines would not address the inconsistencies with S&G 100. The Forest intends to continue working with a variety of user groups to maintain and improve routes across the Forest.

I support and request that all available and existing roads be open and useable for vehicle travel in the El Dorado National Forest. Any roads that were previously closed by litigation and/or political agendas must remain open and useable for citizen vehicle use.

Commenter: 25

**Response:** Pages 3 through 5 of the TM FSEIS explain the reasons that the routes are closed until this analysis is completed. Alternative 1 reopens nearly all of the 42 routes considered in this analysis.

Table 3.1 *Rating of Recreation Value for the 42 Routes*. Regardless of the recreational rating placed on these trails, as a person who enjoys outdoor recreation, sightseeing, picnicking, forest land volunteer and 4-wheel drive owner/operator, all these routes are highly valued for recreation and motorized access to the Forest.

Commenter: 216

**Response:** We agree that all of the 42 routes under consideration in this SEIS are highly valued for recreation and public motor vehicle use, which is why they were proposed for designation in the 2008 TM EIS and ROD. They are also all proposed for designation in Alternatives 1, 3, and 5 of this SEIS.

These meadow routes are an integral part of the minimally functional network of motorized trails proposed for designation in the 2008 decision. These routes represent the bare minimum thread of access to important destinations or system road/trail components, which through even the interim closure imposed by the Court resulted in greater impacts to legitimate public recreation than was reflected by the route mileage of the 42 routes alone.

Commenters: 69, 70, 72, 73, 76, 83, 85

**Response:** Direct effects to public motorized use are discussed on pages 68 through 77 - 80, and indirect effects (including additional miles of roads and trails that would be inaccessible) are displayed on pages 81 through 84.

## Specific Routes

I am in strong favor of keeping routes open for public use. In particular, 16E26, 17E28, 17E24, 17E19, and 17E21. In my observations I am not seeing the “destruction” purported by some that would warrant these mass closures. If it turns out that there is no other choice than to stop travel through meadows, can we at least reroute these short sections of road and trail around them?

Commenter: 2,

**Response:** The Forest acknowledges your desire to keep all of the 42 routes open. Pages 3 through 5 of the TM FSEIS explain the reasons that the routes are closed until this analysis is completed. Alternatives 1 and 5 reopen nearly all of the 42 routes considered in this analysis. In Alternatives 3 and 5, reroutes are one of the possible corrective actions that will be considered.

[I] Would like to see road to Sayles Canyon Trailhead open to public to access the trailhead (11N09A).

Commenter: 8

**Response:** Table 3.7 of the FSEIS shows that road 11N09A does not cross or border a meadow. Alternatives 1, 3, 4, and 5 would open this road to motor vehicle use.

17E21 Horse Canyon Trail is unsuitable for multiple use and should be limited to hikers and equestrians. 17E24 and beyond would be okay for motorized vehicles.

Commenter: 8

**Response:** Table 3.7 in the TM FSEIS shows that trail 17E21 crosses a meadow that meets S&G 100. This trail is proposed to be closed to motor vehicle use in Alternatives 2 and 4, as shown in Table 2.2 of the TM FSEIS. The Forest acknowledges your support for keeping 17E24 open to motor vehicle travel.

The specific route I use the most is 10N14. On this route alone it would be denying myself and many others with disabilities access to over 12 full sections of the ENF. Multiply that by 42 routes and there is a considerable amount of the ENF that would not be accessible to people with disabilities. If Alternative 3 is chosen I would be more than happy to volunteer my time to do whatever I can to help correct the issues on route 10N14 and make it useable.

Commenter: 16

Many of the closed OHV routes offer a unique high-sierra backcountry experience that is otherwise not available to individuals with disabilities that prevent them from accessing the backcountry by foot.

Commenter: 218

**Response:** A discussion of recreation impacts from route closures is presented on pages 77 to 84 in the TM FSEIS. Table 3.12 shows that restricting motor vehicle use on road 10N14 does affect access to other routes in Alternatives 2, 3 and 4. The Forest acknowledges the importance of motorized access. The FSEIS stated on page 64 “High elevation trails provide access to remote areas on the Forest especially for older and less able individuals who might otherwise not be able to enjoy these areas.” The Forest intends to continue working with a variety of user groups to maintain and improve routes across the Forest including the implementation of corrective actions on these routes.

Please prioritize route 14N39 for repair and re-opening since the road needs to remain open for SMUD access and the Placer County Sherriff’s. Please amend any lease agreement to include proper care and maintenance of the access road.

Commenter: 17

Route or Road # 14N39, Richardson Lake to Sourdough Hill, entire route should be designated for public motorized access.

Commenter: 216

**Response:** The Forest acknowledges your support for keeping 14N39 open to motor vehicle travel. The route would be open under Alternatives 1 and 5, and open after corrective actions in Alternative 3. Corrective actions for the routes are also included in Alternative 5. The Forest will continue to work with partners and user groups to maintain and improve routes across the Forest.

Please allow access to portions of the routes that are not affected by meadows. For example, 10N01 appears to have a meadow issue on only one end but the entire trail is marked as closed. Please double check all trails to ensure the maximum access.

Commenter: 17

**Response:** The portions of routes where motor vehicle use would be restricted under Alternatives 2 and 3 are based on the locations of meadows not meeting S&G 100 as well as practical management and use considerations, including the location of desired destinations, use patterns, route intersections and control points (gates), etc. In some instance where meadows are located along routes, the closure point is based on the location of logical turn-around points. In other

instances, the recreational opportunity is through travel, rather than an intermediate destination. The Forest Service has reviewed all of the routes to evaluate whether additional portions could reasonably be opened without impacting the meadows. As a result of this review, Alternative 3 has been modified slightly in the FSEIS to include designation of the eastern portion of 10N01B and the western portion of 17E24.

Please don't close lovers leap trail and surrounding strawberry trails as a lifetime El Dorado County resident I have enjoyed them my whole life. I understand if we can't go through wet areas and down to Plasses and Silver Lake. The forest is for all citizens to use and recreate and not just for 1 group and not others.

Commenter: 26

**Response:** The Lover's Leap trail is designated as open for public motorized use in all alternatives except Alternatives 2 and 4. Strawberry 4WD will be designated in Alternatives 1 and 5 and Alternative 3 will designate this route once corrective actions are implemented.

Please re-open the Blue Lakes/Dear Valley OHV access trail. My once in a year trip and family outing was hampered by the closures. Please reconsider the adventure for my family to enjoy.

Commenter: 30

I am really concerned with the closure of the Blue Lakes/Deer Valley trail (19E01). This is my clubs adopt-a-trail. We were instrumental in working with our members of Congress in the creation of the corridor between the Mokelumne Wilderness and the Mokelumne Wilderness Addition, assuring that the north/south passage between Highways 4 and 88 would remain open for 4WD enthusiasts. In 1984 we entered into an Adopt-a-trail agreement with the ENF and Stanislaus NF to maintain, clean up and provide other stewardship to the Deer Valley Jeep Trail.

Commenter: 10

**Response:** The forest acknowledges your support for keeping 19E01 open to motor vehicle travel. Alternatives 1 and 5 propose amending the LRMP and designating the route. Alternative 3 proposes designating the route after corrective actions are completed.

The Forest Service has screwed the OHV community by closing sections of forest roads. This leaves only sections about 1 mile long open. This essentially closes the whole area. The specific areas would be around the Ice House Reservoir area and Fordyce Lake near Cisco Grove.

Commenter: 33

**Response:** None of the routes analyzed in the FSEIS are near Ice House Reservoir or Fordyce Lake.

The Strawberry, Deer Valley, and Barrett Lake trails are of particular importance to me. Over the decades, we have watched as historical trails on the summit and all across the Eldorado have been closed by the Forest Service against the wishes of the locals, and general public. For all intents and purposes these three trails are the only ones left that are local to us, but trail closures are an unacceptable problem throughout the Eldorado and across the entire National Forest System.

Commenter: 38,

Please prioritize the trails by putting Barrett, Strawberry, and Deer Valley at the top of the list.

Commenter: 44,

I am particularly concerned and disappointed about 17E73 and 19E01. Adopt-a-Trail clubs can continue needed mitigation while the Forest pursues more substantial funding sources.

Commenter: 81,

RTF is particularly disappointed that 16E21, 17E73, and 19E01 are to be closed until mitigation is completed because their use is similar to that of the Rubicon Trail. RTF is concerned that closure until mitigation of these trails will cause additional traffic on the Trail, and no analysis of this consequence was made. This analysis should be completed and any effects should be mitigated.

Commenter: 196,

**Response:** The Forest acknowledges your support for keeping 16E21, 17E73, and 19E01 open to motor vehicle travel. Alternatives 1 and 5 propose amending the LRMP and designating the routes. Alternative 3 proposes designating the routes after corrective actions are completed.

In the Eldorado there are quite a few trails closed at present including one of my favorite, Barrett Lake Jeep Trail, I ask you to give a high priority to whatever needs to be done to get these trails OPEN again.

Commenter: 39,

I would like to request that Barrett Lake Jeep trail remains open during mitigation work this summer and that this condition be applied toward whichever Travel Management

Plan Alternative is chosen. Additionally, the OHV Grant Administrator recommended that Barrett Trail remain open in order that available Grant money is not jeopardized.

The Hi-Landers 4 Wheel Drive Club has a long history with Barrett Lake Jeep Trail. The trail was adopted by our club in 1979 per documents on file. This year marks 34 years of continuous volunteer support for this trail, including several hundred volunteer hours per year.

Commenter: 131

**Response:** The Forest acknowledges your support for keeping Barrett Lake 4WD Trail open to motor vehicle travel. Alternatives 1 and 5 propose amending the LRMP and designating that route. Alternative 3 proposes designating the route after corrective actions are completed.

Please open Strawberry Jeep Trail.

Commenter: 57

**Response:** The Forest acknowledges your support for keeping Strawberry 4WD Trail open to motor vehicle travel. Alternatives 1 and 5 propose amending the LRMP and designating the route. Alternative 3 proposes designating the route after corrective actions are completed.

I use these MC trails and know many others that want these trails to have a higher priority. 17E16, 17E19, and 17E28.

Commenter: 60, 63

Trail 17E28 is listed as not meeting S&G 100; however this is due to single meadow # 17E28-7. All other features in question along this trail either meet S&G 100 or are not meadows. Due to the importance of the trail it should be included in a non-significant plan amendment that would allow the route to be kept open.

Commenter: 199

**Response:** Appendix B has been added to the FSEIS. The table included in Appendix B reflects the Forest's strategy for initiating planning and implementation of corrective actions. It was based on the complexity of corrective actions needed and factors described on pages 73 and 74 of the FSEIS.

I would vote to make the Bucks Pasture trail open for motorcycles as it once was (17E17). It is fun and useful route that helps to connect over to the Hayflat/Packsaddle Pass area and if only motorcycles are allowed I believe the trail would not get so torn up and remain relatively intact for a long time.

Commenter: 75

**Response:** Buck Pasture Trail meets S&G #100 (see Table 2.1), and will be designated for public motorcycle use.

The Barrett Lake trail already is in compliance with S&G100. This document references the trail in its description as "The entrance is through a gate, which is designed to limit the maximum width of vehicles entering the trail. The gate is opened seasonally when the Hi-Landers (a volunteer group that has adopted the trail) complete spring maintenance and the District Ranger determines that the trail is in a condition to prevent resource damage, usually in mid-July. The trail has high use daily while it is open. The gate is closed in the fall when heavy rain or snow creates conditions that could lead to resource damage". This in itself is complying with S&G100 and Executive Order 11644 by "minimizing" impacts to the area.

Commenter: 81

No analysis has been done on Barrett Lake 4WD trail to consider the planning process currently under way. This bridge will bring the trail in to compliance with S&G100 in this location, opening several miles to use. No recognition has been made of past efforts to relocate the trail at one of the meadow locations identified as "not meeting" S&G100. No mention has been made of barriers placed to keep vehicles out of the meadow while on the trail. No mention has been made of the impacts to other "unique" trails in the area when closure will force recreation to trails such as Rubicon, which is in close proximity and according to this SDEIS. Simply closing the trail for any length of time other than seasonally, is "arbitrary and capricious".

The benefits of closing this trail is outweighed by the high value of the recreation experiences and county revenue stream associated with this trail. Rubicon Trail is also in ENF and has been identified as a significant source of revenue for El Dorado County in sales taxes by recreation enthusiasts that spend money while here in the Forest and County. Because of the close similarities of the recreational values for this trail, the same could be held true for Barrett Lake 4WD trail. The trail brings in significant revenue for El Dorado County and the impacts to the County have not been analyzed.

Allow Barrett Lake 4WD trail to remain open to public use while actively pursuing funding for continued corrective action. Actively recruit and utilize existing AAT volunteers to begin immediate work to correct problem areas. Acknowledge work done to date and current planning efforts by analyzing the effects of corrective action done so far.

Commenter: 90, 197

**Response:** Barrett Lake Trail is not in compliance with S&G #100, as described in Table 3.8. The Forest recognizes that a number of measures have been taken to

minimize resource impacts, including limiting width of vehicles and reduced season of use.

It serves no environmental purpose, nor makes any sense to any reasonable person to close 14N39 to OHV use, when heavy machinery regularly travels on the road. It would make much more environmental sense to keep the trail open for both maintenance and OHV use, while utilizing volunteers to correct any issues to S&G100 standards for BOTH maintenance and OHV access to be closed until mitigation is completed because of its use is similar to that of the Rubicon Trail. I'm concerned that closure until mitigation of these trails will cause additional traffic on the Rubicon, and no analysis of this consequence was made. This analysis should be completed and any effects should be mitigated.

Furthermore, this trail (14N39) in particular will still require regular travel for maintenance for the Cell tower and shed at the end of the trail.

Commenter: 81

**Response:** Alternative 5 was added and it will amend the LRMP to designate this route while additional corrective actions are being implemented.

Two routes not meeting S&G 100, Clover/Deer Valley and Schneider Camp/Strawberry connect highways 4, 88 and 50. We would like to see these near the top of the priority list of routes to receive corrective actions if that course of action is required since they form an important connection to highways where services are available and provide a quality high altitude forest travel experience. This is especially pertinent for street licensed OHVs that can utilize these highways for continued travel to other recreation destinations.

It appears there are ten of the nineteen routes listed as not meeting S&G 100 that only have one issue affecting their compliance. Perhaps these routes should be prioritized among some of the first to be brought into compliance if a determination is made to perform remediation.

Commenter: 167

We understand that immediate opening may be difficult due to litigation etc. so we would like to see the following roads focused on first.

Squaw ridge trail near Silver Lake has been in use for over 150 years. I have personally used these roads for 40 years. I have seen no significant change to any areas on or near these roads. This road leads from Hwy 88 some 8 plus miles to a place we can park and access favorite lakes. It is not difficult to traverse via a normal 4x4 vehicle. Even a partial closure of this road will cut us off from accessing areas we have used for 40 plus years. Next would be Deer valley trail near blue lakes that leads to Hwy 4. This is yet another

road that if closed will cut off access to areas that have been used for years. We have used Deer Valley as a connector route many times. Next would be Strawberry road that leads from Hwy 88 near Caples Lake to Hwy 50. This is yet another connector road that is used by MANY people for recreation. These are only 3 routes but we feel important to be focused on first. You need to look at each route and the ones that provide a connection need and consider opening them.

Commenter: 184

**Response:** Appendix B has been added to the FSEIS. The table included in Appendix B reflects the Forest's strategy for initiating planning and implementation of corrective actions. It was based on the complexity of corrective actions needed and factors described on pages 73 and 74 of the FSEIS.

We take exception, in the DSEIS to the classification of the Deer Valley Jeep Trail being rated as Medium in the recreational value. The traffic on this trail far exceeds that of the Barrett Lake Trail due to its being open earlier in the year and allowing passage between Highway 4 and Highway 88. On any weekend there are many recreationalists camping at the Deer Creek crossing and at Clover Valley.

Commenter: 192,

**Response:** Table 3.1 in the FSEIS reflects that the Deer Valley trail has high value.

Trail 17E28 is listed as not meeting S&G 100; however this is due to single meadow # 17E28-7. All other features in question along this trail either meet S&G 100 or are not meadows. This is a 3.81 mile "motorcycle" trail that provides unique opportunity on the Forest. Closure of this trail due to a single issue as is proposed in Alt 4 is not a balanced approach to providing recreational opportunity while protecting natural resources. This trail was originally proposed to be kept open under a non-significant plan amendment in the FEIS/ROS. Due to the importance of the trail it should be included in a non-significant plan amendment that would allow the route to be kept open.

Commenter: 199,

Route 17E19 is a unique route that was proposed to be open under a non-significant Forest Plan Amendment in the FEIS/ROD. The SEIS should include a non-significant plan amendment to exempt this route from S&G 100 and RCO#2 to allow it to be left open. This route should be left open to public motorized use.

Commenter: 199,

Since Barrett Lake 4WD is highly rated for recreational value and has been adopted by a 4WD club, and is monitored and closed seasonally by the District Manager, this trail

should be reopened seasonally immediately for all use, including rock crawling in our Jeep, hiking, biking, ATV, and motorcycle use.

Commenter: 201,

Richardson Lake/ Sourdough Hill is a road not a trail and should be managed as such by the Forest. It is highly important to keep this route open and it would be far better maintained via a strong adopt-a-trail presence than to let it be closed for an undetermined length of time allowing the erosion conditions to accelerate.

Commenter: 203,

We are interested in keeping open Mud Lake road from Tragedy Springs to Mud Lake and from Allen Camp to Squaw Ridge. We would also like to keep the roads open along Squaw Ridge.

Commenter: 210,

**Response:** Alternative 1 proposes to amend the LRMP to designate these routes. Alternative 5 has been added and proposes to amend the LRMP to designate these routes prior to completing corrective actions. Alternative 3 designates these routes after corrective actions are implemented. Alternative 4 designates the Barrett Lake 4WD trail after corrective actions are implemented.

Route 17E21 is proposed for closure pending mitigation, yet this route borders only one meadow that actually meets S&G 100 according to the field survey. This route is a challenging single track that creates a loop with 17E19, 17E28, and 16E26 and is one of the few trails of its kind. This would greatly diminish availability of this unique recreational opportunity. This closure does not appear justified because the trail meets S&G 100. Furthermore there is no other justification for closure of this trail provided in the SEIS. This trail should remain open to motorized use.

Commenter: 199,

**Response:** This route would be designated for motorcycle use in Alternatives 1, 3 and 5. It meets Standard and Guideline #100.

Those routes that do not intersect (as defined above), and simply “border” as defined in S & G 100 **shall not be prohibited** from public wheeled motorized vehicles until the Supplemental EIS is completed, nor at any other future time. These routes are: 9N95, all sections; 16E21 at -1, -2, -3, -4, & -5; and 17E28, all sections.

Commenter: 200,

The phrase “routes may not intersect or bisect meadows” has “no home” in the LRMP or in the SNFPA. This phrase does not appear in any of the LRMP Meadow Management

Standards and Guides and is not listed under General Direction for any management practice. The Phrase does not occur in any of the SNFPA ROD Standard and Guides for Meadows or for Roads.

**Response:** As described in the background section on pages 3 and 4, the Court order prohibited public wheeled motorized vehicle use on the 42 routes until such time as the Forest Service completes a SEIS. The decision for this FSEIS will determine which routes will be designated for public motor vehicle use. The analysis in this document addresses consistency with Standard and Guideline #100 (page 36 of this FSEIS) which refers to roads and trails that intercept, divert or disrupt natural surface and subsurface water paths, regardless of whether the route intersects or borders a meadow.

The meadows in Indian Valley, Little Indian Valley and Clover Valley have been extensively damaged by OHV misuse, resulting in head cuts at stream crossings, large mud holes dug down to the level of the undercut streams, etc. These meadows need to be protected and restored, especially in light of the predictions for global warming in the future. Proper functioning meadows that store water later into the season will become more and more important as a source of clean water—one of the primary purposes of the National Forest. The Blue Lakes Road area has been heavily damaged by off-road OHV use in the last 10 years. We support proposals to close user-made trails in that area.

Trail 17E21 is in a largely roadless area east of Silver Lake. While it provides a potential loop to persons who have come along route 17E24 to the south and west, in this case motorized use is inappropriate. Our members extensively hike and mountain bike on the ridge between Silver Lake and Kirkwood, which includes the superb Thunder Mountain and Horse Canyon trails. There should be some area above Silver Lake that is free from motorized use.

Route 10N32 (Headwaters, Beanville Creek) should be closed to motorized use because it is in a sensitive watershed.

Commenter: 221

**Response:** Alternative 4 was developed to address concerns with these routes and would result in eliminating them from public motorized use. The routes would also remain closed in Alternative 2, no action.

## Volunteers

Suggest starting a website to request specialists and resources needed to do analysis to help with fixes and work parties.

Commenter: 6

**Response:** Following the decision, the Forest will consider a variety of options to use volunteers in completing corrective actions.

It is imperative that the Forest Service stand their ground and utilize the resources you have within the 4x4, mountain bike, and motorcycle communities. Clubs are standing ready, begging for any and all opportunities to work with you to address any trail projects to ensure our public lands remain open for everyone.

Commenter: 38

I feel the OHV group as a whole has proven again and again when asked to partner up on any multi use access program we have given freely of our time and funding through work programs, donations, and green sticker registration fees. If I could only trace the tail of the infamous “green sticker OHV” fund I am sure it would cast a very broad net, not the least of which being projects like those outlined in the SEIS.

Commenter: 40

The off road community has shown their willingness to come together and improve/maintain routes when a plan is in place. I am sure other users of these trails would be willing to help also.

We continue to offer our volunteer support to the Amador Ranger District for any mitigation items that need manpower to accomplish.

Commenter: 192,

The Forest Service can get help on doing the work on these 18 routes. There already is a good history of the OHV community coming to the aid of the Forest Service. The Rubicon Trail is a perfect example of how work can be done while still leaving the trail open. You already have some of these routes "adopted". A request from the Forest Service would get the OHV users out in force to keep their few routes open

Commenter: 222

**Response:** The Forest will continue to work with partners and user groups to maintain and improve routes across the Forest and seek funding opportunities through grants and other sources. Before further corrective actions can begin, environmental analysis will need to be completed and documented.